

JOHN ASHCROFT  
Governor

G. TRACY MEHAN III  
Director



STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176  
Jefferson City, MO 65102

Division of Energy  
Division of Environmental Quality  
Division of Geology and Land Survey  
Division of Management Services  
Division of Parks, Recreation,  
and Historic Preservation

August 30, 1991

Mr. Michael Sanderson  
RCRA Branch Chief  
U.S. EPA Region VII  
Kansas City, KS 66101

RECEIVED

SEP 1 1991

RCOM SECTION

SEP 1 1991

USEPA, RCRA Branch

Dear Mr. Sanderson:

With this letter, the Missouri Department of Natural Resources transmits to EPA, the case of Knapheide Manufacturing, West Quincy, Illinois, for enforcement of violations triggered by the Toxicity Characteristic Leaching Procedure (TCLP) rule. Missouri is not TCLP authorized, nor had the state adopted regulations incorporating the TCLP rule at the time of the inspection.

The March 15, 1991, Resource Conservation and Recovery Act (RCRA) inspection revealed that the facility had been storing, as nonhazardous, waste paint filters that exhibited toxicity for cadmium above the regulated maximum limits.

The facility has since manifested the material off-site; however, there are violations of storage over 90 days and operation of an interim status TSDF without a permit that have not been addressed. The facility is, however, in compliance with all other violations noted in the inspection.

The inspection report and other documentation are enclosed. If you have any questions, please contact Mr. Bruce Martin of my staff at (314) 751-3176.

Sincerely,

HAZARDOUS WASTE PROGRAM

Nicholas A. Di Pasquale  
Director

NAD:egs

Enclosures



Printed on recycled paper.



R00036129

RCRA Records Center

DATE: 7-11-1991

TO: Hazardous Waste Management Program  
FROM: Northeast Regional Office

\* SEND TO EPA

**ENFORCEMENT ACTION REQUEST**  
**DIVISION OF ENVIRONMENTAL QUALITY**

The Macon Regional Office is requesting enforcement action by the \_\_\_\_\_  
Hazardous Waste Management Program on Knapheide Manufacturing Co.

1. Brief description of violation.

Knapheide Manufacturing Co. found to be in violation of hazardous waste regulations concerning manifest completion, land ban notifications, personnel training documentation, aisle space, contingency plan and determination that waste was a hazardous waste.

2. The violations (with statute or regulation citations) that are documented by this file are as follows:

See Attached

3. To settle this issue, it is requested that the following action be taken (corrective action, compliance schedule, etc.):

Refer to U.S. Environmental Protection Agency for enforcement follow-up as outline in June 18, 1991 memo from Bruce Martin.

Sam Wilson

Paul Deek

Regional Administrator

7-11-91

Date

Technical Review

7/12/91

Date

Approval

Attachments:

\_\_\_\_ File Critique

\_\_\_\_ File Summary

X File

\_\_\_\_ Other \_\_\_\_\_

cc: Field Services

**RECEIVED**

JUL 15 1991

WASTE MANAGEMENT PROGRAM  
MISSOURI DEPARTMENT OF  
NATURAL RESOURCES

1. Hazardous waste manifests for out of state shipments (including manifest #91021) did not include the Missouri hazardous waste manifest document number as required by Missouri Hazardous Waste Management Commission (MHWMC) Regulation 10 CSR 25-5.262(2)(B)2A.
2. Hazardous waste manifests (including manifest #91020 and 91021) did not include the license plate number for the waste-carrying portion of the vehicle used to transport waste, including the state of registration as required by MHWMC Regulation 10 CSR 25-5.262(2)(B)2C.
3. Hazardous waste manifests for out of state shipments (including manifest #91021) did not include the transporter's Missouri ID number as required by MHWMC Regulation 10 CSR 25-5.262(2)(B)2D.
4. Hazardous waste manifests for wastes measured in gallons (including manifest #91020 and 91021) did not include the specific gravity for the wastes as required by MHWMC Regulation 10 CSR 25-5.262(2)(B)2I.
5. Hazardous waste manifests (including manifest #91020 and 91021) did not include an alternate designated facility or instructions to the transporter to return the waste to the generator if it is undeliverable as required by MHWMC Regulation 10 CSR 25-5.262(2)(B)2 referenced to 40 CFR 262.20(c) and (d).
6. The generator did not have documentation that he has provided an appropriate land ban notification with each shipment of waste which is subject to land disposal restrictions as required by 40 CFR 268.7.
7. Personnel training documents did not include documentation of the hazardous waste director's qualifications or training as required by MHWMC Regulation 10 CSR 25-5.262(2) referenced to 40 CFR 262.34(a)(4) which references 40 CFR 265.16(d)(4).
8. Adequate aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment in an emergency was not maintained in the hazardous waste container storage area as required by MHWMC Regulation 10 CSR 25-5.262(2) referenced to 40 CFR 262.34(a)(4) which references 40 CFR 265.35.
9. The contingency plan includes outdated information and needs to be updated as required by MHWMC Regulation 10 CSR 25-5.262(2) referenced to 40 CFR 262.34(a)(4) which references 40 CFR 265.54.
10. The generator did not determine that the waste paint filters were a hazardous waste in a timely manner as required by MHWMC 10 CSR 25-5.262(2) referenced to 40 CFR 262.11.

JOHN ASHCROFT  
Governor

G. TRACY MEHAN III  
Director



STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES  
MEMORANDUM

Division of Energy  
Division of Environmental Quality  
Division of Geology and Land Survey  
Division of Management Services  
Division of Parks, Recreation,  
and Historic Preservation

DATE: June 18, 1991

TO: Sam Wilson  
Northeast Regional Office

FROM: R. Bruce Martin, Chief  
Hazardous Waste Enforcement Unit, Waste Management Program

SUBJECT: Knapheide Mfg. Co.

As per our telephone discussion of June 14, 1991, please refer the case of Knapheide Mfg. Co. to the Waste Management Program (WMP). Your RCRA inspection of March 15, 1991, and the company's subsequent responses, indicate the presence of violations of the toxicity characteristic regulations. Upon receipt, the WMP will issue a notice of violation and refer the case to U.S. Environmental Protection Agency for enforcement follow-up. Missouri is not presently authorized to enforce TC violations.

Thank you.

RBM:sw

Northeast Regional Office  
Date Received

JUN 24 '91

ADMU   R    
APCU             
PDWU             
WMU   RD    
WPCU             
Copies to:           



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JOHN ASHCROFT  
Governor

G. TRACY MEHAN III  
Director



STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

Division of Energy  
Division of Environmental Quality  
Division of Geology and Land Survey  
Division of Management Services  
Division of Parks, Recreation,  
and Historic Preservation

DIVISION OF ENVIRONMENTAL QUALITY

Macon Regional Office  
Highway 63 North  
P.O. Box 489  
Macon, MO 63552  
816-385-2129

CERTIFIED MAIL  
P 461 505 661

3.800 Marion  
Knapheide Mfg. Co.

LOW #91-NE.007

April 5, 1991

RECEIVED  
APR 10 1991  
WASTE MANAGEMENT  
MISSOURI DEPARTMENT OF  
NATURAL RESOURCES

Mr. Harold Huggins  
Manufacturing Engineering Manager  
Knapheide Manufacturing Co.  
436 S. 6th St.  
Box C140  
Quincy, IL 62306

Dear Mr. Huggins:

Enclosed is a copy of Resource Conservation and Recovery Act and Missouri Hazardous Waste Management Law Compliance Evaluation Inspection Report, which I believe is self-explanatory. Please direct your attention to the recommendations in the report.

A large number of unsatisfactory features are indicated in the report and recommendations are made for their correction. Please respond in writing to each of the items no later than May 5, 1991 (30 days). Your response to each recommendation or unsatisfactory feature should be very specific and should indicate how each item has been corrected and what action has been taken to prevent the reoccurrence of the deficiency. Supporting documents such as copies of recent manifests, land ban notification, personnel training documents, contingency plan update, memos to staff, etc., should be included to document return to compliance. All responses should be

Mr. Harold Huggins  
April 5, 1991  
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sent to our Northeast Regional Office with a copy to the Hazardous Waste Enforcement Unit, Waste Management Program, P.O. Box 176, Jefferson City, MO 65102.

If you have questions concerning the report, please contact Sam Wilson in our Northeast Regional Office in Macon.

Sincerely,

NORTHEAST REGIONAL OFFICE



Charles S. Decker, P.E.  
Regional Administrator

CSD/SW/lis

Enclosure

cc: Waste Management Program ✓  
Mark Twain Regional Council of Governments

RESOURCE CONSERVATION & RECOVERY ACT  
AND  
MISSOURI HAZARDOUS WASTE MANAGEMENT LAW  
COMPLIANCE EVALUATION INSPECTION REPORT

Facility

Knapheide Manufacturing Co.  
Highway 24  
West Quincy, MO

EPA ID: MOD000766998  
MO Generator ID: 004809

Mailing Address:

436 S. 6th Street  
Box C140  
Quincy, IL 62306

Participants

Knapheide Manufacturing Co.

Mr. Harold D. Huggins  
Manufacturing Engineering Manager

Mr. Jim Rubottom  
Director of Human Resources

Missouri Department of Natural Resources

Mr. Don Head  
Environmental Specialist  
Northeast Regional Office

Mr. Sam Wilson  
Environmental Specialist  
Northeast Regional Office

Introduction

An inspection was conducted of the hazardous waste management activities at the Knapheide Manufacturing Co. plant located in West Quincy, Missouri on March 15, 1991. The visit was to determine compliance with the Missouri Hazardous Waste Management Law (MHWML) and regulations and the federal Resource Conservation and Recovery Act (RCRA) and regulations. The inspection was conducted under authority of Sections 260.375(9) and 260.377 RSMo.

Facility Description

The Knapheide Manufacturing Co. plant in West Quincy, Missouri manufactures truck beds, utility bodies and tool boxes. Steel members are cut, shaped, and welded to form the framework for a truck bed. Yellow pine lumber is tongue and grooved and cut to fit the framework. The entire unit is primed and painted with an alkyd enamel. The utility bodies and toolboxes are assembled, welded, and primed prior to shipping. Metal components are steam cleaned with an alkalide cleaning solution supplied by Detrex.

The Knapheide plant is registered as a large quantity generator of hazardous waste. The largest waste stream is waste xylene, which is currently being



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and  
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generated at approximately 500 gallons per month. The waste solvent is generated from the cleaning of the painting equipment. It is being transported by Schiber Truck Company, Inc. (ILD006493191; H-1427) to Continental Cement Company (MOD054018288; R188) to be utilized in a supplemental fuels program. A small quantity of waste oil being generator is mixed with the waste xylene and handled in the same manner.

Waste paint related material is also generated periodically. Records indicate an average generation rate of approximately 36 gallons per month. This waste is shipped by Schiber Truck Company, Inc. to Petro-Chem (MID980615298) at Detroit, Michigan. At the time of inspection there was no waste paint related material in storage.

Unsatisfactory Features

1. Hazardous waste manifests for out of state shipments (including manifest #91021) did not include the Missouri hazardous waste manifest document number as required by Missouri Hazardous Waste Management Commission (MHWMC) Regulation 10 CSR 25-5.262(2)(B)2A.
2. Hazardous waste manifests (including manifest #91020 and 91021) did not include the license plate number for the waste-carrying portion of the vehicle used to transport waste, including the state of registration as required by MHWMC Regulation 10 CSR 25-5.262(2)(B)2C.
3. Hazardous waste manifests for out of state shipments (including manifest #91021) did not include the transporter's Missouri ID number as required by MHWMC Regulation 10 CSR 25-5.262(2)(B)2D.
4. Hazardous waste manifests for wastes measured in gallons (including manifest #91020 and 91021) did not include the specific gravity for the wastes as required by MHWMC Regulation 10 CSR 25-5.262(2)(B)2I.
5. Hazardous waste manifests (including manifest #91020 and 91021) did not include an alternate designated facility or instructions to the transporter to return the waste to the generator if it is undeliverable as required by MHWMC Regulation 10 CSR 25-5.262(2)(B)2 referenced to 40 CFR 262.20(c) and (d).
6. The generator did not have documentation that he has provided an appropriate land ban notification with each shipment of waste which is subject to land disposal restrictions as required by 40 CFR 268.7.
7. Personnel training documents did not include documentation of the hazardous waste director's qualifications or training as required by MHWMC Regulation 10 CSR 25-5.262(2) referenced to 40 CFR 262.34(a)(4) which references 40 CFR 265.16(d)(4).



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8. Adequate aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment in an emergency was not maintained in the hazardous waste container storage area as required by MHWMC Regulation 10 CSR 25-5.262(2) referenced to 40 CFR 262.34(a)(4) which references 40 CFR 265.35.
9. The contingency plan includes outdated information and needs to be updated as required by MHWMC Regulation 10 CSR 25-5.262(2) referenced to 40 CFR 262.34(a)(4) which references 40 CFR 265.54.
10. The generator did not determine that the waste paint filters were a hazardous waste in a timely manner as required by MHWMC 10 CSR 25-5.262(2) referenced to 40 CFR 262.11.

Comments

This inspection included an opening conference, records review, facility tour and closing conference on March 15, 1991. After receiving complete laboratory analysis for the paint filters, another visit was made to the facility on March 28, 1991 to verify information on the paint filters. Mr. Harold Huggins, manufacturing engineering manager, was present during both visits and supplied information for the inspection.

Missouri state regulations require that certain information, in addition to that required by federal regulation, be included on each hazardous waste manifest. Each manifest must include the transporter's Missouri ID number, the license plate number and state of issue for the waste-carrying portion of the vehicle used to transport the waste, the specific gravity for wastes reported in gallons, liters, or cubic yards, and the Missouri hazardous waste manifest document number. This document number consists of the six digit Missouri generator identification number and the consecutive shipment number. This information was not included on a number of hazardous waste manifests including manifest numbers 91020 and 91021 (attached).

Manifests including numbers 90120 and 91021 did not list an alternate designated facility or instructions for the transporter in case the waste cannot be delivered to the first designated facility. One of these pieces of information must be included on the manifest in case unforeseen circumstances make delivery to the designated facility impossible.

With each shipment of hazardous waste that is restricted from land disposal, an appropriate land ban treatment standards notification must be sent to the receiving facility. This notification is to accompany the manifest and a copy should be kept by the generator to document that they have met the requirements. Mr. Huggins reported that Knapheide sends an appropriate notification with each shipment, but they have failed to keep copies of the notifications.

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The liquid hazardous waste is stored in a dedicated building that is designed to meet the state requirements for liquid hazardous waste storage. It was reported that anyone working in the building is provided with a two-way radio for emergency communications. The drums were placed in this building in a manner that restricts the unobstructed movement of personnel and equipment. Adequate aisle space must be provided to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, etc. in an emergency.

Mr. Huggins is now acting in the capacity of the hazardous waste director. Personnel training document maintained at the facility did not include Mr. Huggins qualifications or training that qualifies him for this role.

During the opening conference, Mr. Jim Rubottom was introduced as the emergency coordinator. However, in reviewing the contingency plan, it was found that Mr. Steve Meckes is still listed as the emergency coordinator. The contingency plan needs to be updated to include current staff and any other changes that have been made.

At the time of inspection the management of the waste paint filters and overspray papers was discussed. Mr. Huggins reported that at one time they had treated the filters as ignitable hazardous waste. These wastes, prior to September 25, 1989, had been burned in an on-site Brule incinerator. However, on that date the incinerator was found to be in unusable condition and Knapheide was issued a Notice of Violation for open burning of ignitable hazardous waste. Knapheide was advised to cease burning the material on site and to make arrangements for its proper disposal. Mr. Huggins explained that since that time Knapheide has been working with Brule incinerator representatives towards replacing the existing incinerator and has been advised by those representatives that the material should not be considered an ignitable hazardous waste.

Mr. Huggins produced page 2 of 2 of a laboratory analysis from SCI Environmental, Inc. indicating Sample Number - 4310, Sample Identity-Composite, and Ignitability (degrees F.) - >200. The analysis was signed by Elizabeth M. Cohoon, laboratory manager, and was dated 3/12/91. Mr. Huggins explained that based on this analysis the material is not an ignitable hazardous waste. Since the analysis sheet observed did not adequately describe the sample analyzed, Mr. Huggins agreed to fax the complete analysis report to the inspector's office, as the rest of the report was in his office in Quincy, Illinois. After receiving the complete analysis report it was noted that the Toxicity Characteristic Leaching Procedure (TCLP) was also conducted on the sample. This analysis reported chromium at 6.25 ppm. The regulatory limit for chromium is 5.0 ppm. Therefore, this waste should be classified as a D007 characteristic hazardous waste. A follow-up visit was made to the facility on March 28, 1991 to observe how this waste has been handled. Knapheide has handled the waste as non-hazardous since it ceased burning the waste in September 1989. There are currently over 600 55 gallon drums of the waste stored on site. The material has not been stored or labeled as hazardous

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waste. Mr. Huggins indicated that the only paint line that contains chromium is the "vinyl-wash" line and that he now intends to have the filters from each line analyzed separately in an attempt to minimize the amount that will have to be handled as hazardous. He also said they are contemplating changing to a primer that does not contain chromium.

Federal regulations require that a generator determine if his waste is hazardous. Although Knapheide has been generating this waste for several years and has been storing it since September 1989, Knapheide had failed to determine if the paint filter waste was hazardous until the time of inspection. An accurate hazardous waste determination should be made at the time a wastestream begins to be generated. The paint filter waste must now be handled as a hazardous waste.

Recommendations

- ✓ 1. That all hazardous waste manifest include the Missouri hazardous waste document number as required by MHWMC Regulation 10 CSR 25-5.262(2)(B)2A.
- ✓ 2. That all hazardous waste manifests include the license plate number and state of issue of the waste-carrying portion of the transporting vehicle as required by MHWMC Regulation 10 CSR 25-5.262(2)(B)2C.
- ✓ 3. That all hazardous waste manifests include the transporter's Missouri ID number as required by MHWMC Regulation 10 CSR 25-5.262(2)(B)2D.
- ✓ 4. That all hazardous waste manifests for waste reported in gallons, liters, or cubic yards include the specific gravity for the wastes as required by MHWMC Regulation 10 CSR 25-5.262(2)(B)2I.
- ✓ 5. That all hazardous waste manifests include an alternate designated facility or instructions to the transporter to return the wastes to the generator if it is undeliverable as required by MHWMC Regulation 10 CSR 25-5.262(2) referenced to 40 CFR 262.20(c) and (d).
- ✓ 6. That the generator maintain documentation at the facility that an appropriate land disposal restrictions notification has been provided to the designated facility with each shipment of waste subject to the land disposal restrictions as required by 40 CFR 268.7.
- ✓ 7. That personnel training documents kept on site include documentation of the hazardous waste director's qualifications or training as required by MHWMC Regulation 10 CSR 25-5.262(2) referenced to 40 CFR 262.34(a)(4) which references 40 CFR 265.16(d)(4).
- ✓ 8. That adequate aisle space be provided in all areas as required by MHWMC Regulation 10 CSR 25-5.262(2) referenced to 40 CFR 262.34(a)(4) which references 40 CFR 265.35.

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- ✓ 9. That the contingency plan be updated to include current information as required by MHWMC Regulation 10 CSR 25-5.262(2) referenced to 40 CFR 262.34(a)(4) which references 40 CFR 265.54.
10. That the generator determine if each waste stream is hazardous as required by MHWMC Regulation 10 CSR 25-5.262(2) referenced to 40 CFR 262.11 at the time that the waste stream generation begins.
11. That Knapheide comply with all provisions of MHWMC Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Part 262 concerning the hazardous waste paint filters and overspray papers and submit written documentation to the Department of Natural Resources showing the material was properly disposed of within 30 days of receipt of this report.

SUBMITTED BY:

Sam Wilson

Sam Wilson  
Environmental Specialist IV  
Northeast Regional Office

SW/lb

## LARGE QUANTITY GENERATOR CHECKLIST

Form LQG-INSP  
(10-15-88)Name of Facility: Kampheide Manufacturing CoDate: 3-15-91Address: West Quincy, MoOther Inspections Done:  
RR      TRANS      LDR X  
OTHER     436 S. 6th Street, Box C140  
Quincy IL 62306Phone: (217) 222-7131 MO ID# 04809EPA ID# MO D000766998Facility Representative: Harold HugginsTitle: Plg. Engineering Manager

Briefly describe manufacturing process(es). (Use continuation sheet, if needed.)

Facility manufactures truck platform beds, utility bodies and  
tool boxes for trucks. Lumber is tongue & grooved. Sheet metal  
is fabricated off site and shipped to generator for assembly. Products  
are assembled, welded, primed &/or painted and shipped.

List of wastes generated. (Use continuation sheet, if needed.)

Waste	Amount/Month	Disposition
1. <u>Waste Paint Related Material</u>	<u>167 kg/month</u>	<u>Petro Chem, Detroit</u>
2. <u>Waste Xylene Mixture</u>	<u>1582 kg/month</u>	<u>Continental Cement Co.</u>
3. <u>Waste Oil</u>	<u>    </u>	<u>Continental Cement Co.</u>
4. <u>Waste Paint Filters</u>	<u>    </u>	<u>    </u>
5. <u>    </u>	<u>    </u>	<u>    </u>

A. MANIFESTS AND RECORDKEEPING 10 CSR 25-5.262(2) AND 5.262(3)(B) AND 10 CSR 25-5.262(3)(C)1 AND 5.262(3)(C)2

Generator's MO and EPA I.D. Numbers. . . . .

Manifest document number (MO I.D. & Shipment #) . . . . .

EPA Waste I.D. codes . . . . .

Generator's name, address, phone # . . . . .

All Transporters' names, phone #s, MO and EPA I.D. #'s. . . . .

Designated facility name, address, phone # and MO and EPA I.D. # . . . . .

Proper DOT Shipping Name, Hazard Class and I.D. # . . . . .

Containers, Quantity and Unit Vol being shipped properly designated . . . . .

Proper certification including waste minimization. . . . .

Manifest properly signed and dated . . . . .

No more than 10 days time between generator and facility signatures. . . . .

Manifests returned within 15 days. . . . .

If not, exception generator report submitted within 45 days. . . . .

Completed manifests and Summary Manifest Report and Certification. . . . .

Spills of reportable quantities reported to DNR. . . . .

Vehicle lic # &amp; state . . . . .

Directions if undeliverable . . . . .

B. PRETRANSPORT, CONTAINERIZATION AND LABELING 10 CSR 25-5.262(2) AND 5.262(3)(C)1

Waste Packaged, marked and labeled per DOT during entire on-site storage period and prior to transport. . . . .

Placards available for use by transporters . . . . .

Satellite accumulation requirements met (if applicable). . . . .

a. Stored in satellite areas less than 1 year. . . . .

b. Containers marked identifying contents and beginning date . . . . .

c. Containers kept closed/compatible/good condition. . . . .

d. Quantities accumulated not exceeding 55 gal. (1 qt. acutely . . . . .

hs. waste). . . . .

C. STORAGE STANDARDS 10 CSR 25-5.262(2) AND 5.262(3)(C)2 AND 3

Facility inspected and maintained. . . . .

Date of accumulation marked. . . . .

Storage less than 90 days (unless small quantity generator). . . . .

D. CONTAINER STORAGE 10 CSR 25-5.262(2) AND 5.262(3)(C)2

Containers in good condition . . . . .

Containers kept closed in storage. . . . .

Containers storing incompatible waste separated or protected from each other. . . . .

Containers of ignitable or reactive waste stored &gt; 50 feet from property line . . . . .

Containers stored within a containment system (if applicable) meeting criteria of 10 CSR 25-5.262(2)(C)2,3. . . . .

E. STORAGE TANKS 10 CSR 25-5.262(2) AND 5.262(2)(C)2.C.  
(See tank checklist)

F. PERSONNEL TRAINING 10 CSR 25-5.262(2)

Documentation of hazardous waste director's qualifications or training. ☒   
Completed classroom or on-the-job training. . . . . ☒   
Job title, description, and name of person filling position . . . . . ☒   
Written record of the type and amount of training given . . . . . ☒   
Documentation confirming that training has been given . . . . . ☒

-not on file

Update Scheduled  
Training by Coctens  
KC.

G. PREPAREDNESS AND PREVENTION 10 CSR 25-5.262(2) AND 5.262(2)(C)2.E.

Internal communication or alarm system. . . . . ☒   
Device in the hazardous waste operation area capable of summoning emergency assistance. . . . . ☒   
Fire control, spill control, and decontamination equipment available. . . . . ☒   
Adequate water supply for fire control equipment. . . . . ☒   
Adequate and proper safety equipment available. . . . . ☒   
Adequate aisle space. . . . . ☒   
Arrangements with local emergency agencies. . . . . ☒

- Two ~~way~~ way Radio

in H.W. Storage area

H. CONTINGENCY PLAN AND EMERGENCY PROCEDURES 10 CSR 25-5.262(2)

Contingency Plan. . . . . ☒   
Detailed description of procedures that personnel must implement to respond to fires, explosions, or releases of hazardous waste. . . . . ☒   
Describe formal arrangements with emergency agencies. . . . . ☒   
Name, addresses, and phone numbers (home & office) of emergency coordinators. . . . . ☒   
Emergency equipment including its description and location. . . . . ☒   
Evacuation plan if applicable . . . . . ☒

NEEDS to be updated

Lists Steve Meekes As  
Emg. Coord.

I. WASTE OIL 10 CSR 25-11.010

Written waste oil contract maintained . . . . . ☒   
Waste oil properly stored and transported . . . . . ☒

waste oil handled  
with waste xylene

COMMENTS: Jim Rubottom - Em Coord.

Facility did not determine that paint filters are a hazardous waste until pointed out by the inspector.

Inspector Signature & Title: Sam Wilson ESIV

Office: NERO

IN COMPLIANCE ☒

IN VIOLATION OR  
ABSENT ☒

LAND DISPOSAL RESTRICTION CHECKLIST  
FOR P-SOLVENT AND DIOXIN WASTES

Facility: Knapheide Mfg. Co  
Box 2140

Date: 3/15/91 C. TREATMENT/STORAGE FACILITY REQUIREMENTS N/A

Quincy, IL 62306

Missouri I.D.#: 04809

Facility Representative: Harold Huggins

EPA I.D.#: MO D000766978

Title: Mfg. Engineering Manager Phone #: (217) 222-7131

Facility Status: Large Quantity Generator ☒  
Small Quantity Generator ☐  
Treatment/Storage Facility ☐  
Land Disposal Facility ☐  
Permitted ☐

A. GENERAL

1. Specify the wastes handled by the facility which are subject to the land disposal restrictions:

EPA Waste Code (F001)	Waste Description
<u>F003, F005</u>	<u>Waste Print Related Material</u>
<u>F003, F005</u>	<u>Waste Xylene Mixture</u>

Are these wastes properly classified? Yes ☒ No ☐

2. Which, if any, of the following exemptions or extensions apply to this facility?

- Two-year national capacity extension of the effective date for solvent wastes generated by small quantity generators (268.30) ☐
- Two-year statutory exemption for solvent wastes generated from RCRA corrective or CERCLA Section 104 and 106 response actions (268.30) ☐
- Two-year national capacity extension of the effective date for solvent-water mixtures, solvent-containing sludges, or solvent-containing soil (non-CERCLA/RCRA corrective action) containing less than 1% total F001-F005 solvent constituent (268.30) ☐
- Other, specify (268.4, 268.5, 268.6, 268.31, 268.44) ☐

3. Has the facility used dilution of a restricted waste as a substitute for adequate treatment to achieve compliance (268.31)?

yes ☐ no ☒

4. List facilities to which off-site shipments of restricted wastes have been sent and/or from which shipments have been received.

a. Petro Chem  
b. Continental Cement Co.

B. GENERATOR REQUIREMENTS

1. Generator has adequately tested his wastes using the TCLP, or applied knowledge, or both. (268.7(a)) ☒
2. Generator has determined the appropriate treatment standards for his restricted wastes. (268.7 and Subpart D) ☒
3. The generator is not sending restricted waste to a land disposal facility for direct land disposal without treatment. ☒
4. a. If restricted wastes require treatment prior to land disposal, then the generator has provided notification to the treatment facility with each off-site shipment. (268.7(a)) ☒
4. b. If restricted wastes do not require treatment prior to land disposal, then the generator has provided a notification and certification to the LDF that the wastes meet all applicable treatment standards and prohibitions (268.7(a)) ☒
- Certifications properly worded ☒
5. If the generator's restricted waste is subject to any exemptions

1. The facility is not sending restricted waste to a land disposal facility for direct land disposal without treatment. ☒
2. The treatment facility has adequately tested its treatment residues using TCLP, or applied knowledge, or both to determine whether or not they meet the applicable treatment standards specified in 268.41 (268.7(b)) ☒
3. The facility has modified its waste analysis plan to include the additional testing requirements of 268.7, referenced in 264.13 and 265.13. ☒
4. a. If the waste treatment residues do not meet applicable treatment standards or prohibitions, and are sent to another treatment facility prior to land disposal, then the facility complied with the generator notification requirement of 268.7(a). (268.7(b)) ☒
4. b. If the treatment residue does not require further treatment prior to land disposal, then the facility submitted to the LDF with each shipment of waste residue a certification that the waste is in compliance with applicable treatment standards. (268.7(b)) ☒
- Certifications properly worded ☒

5. The facility's written operating record has been modified, and now includes the documentation required by 264.73(b)(3)(10)(11)(12) or 265.73(b)(3)(8)(9)(10) ☒
6. If the facility has stored restricted wastes for greater than one year, then it can satisfactorily demonstrate that the storage has been for the purpose of accumulating an amount necessary to facilitate proper recovery, treatment or disposal (268.50) ☒
7. If the treatment facility is permitted, it has made the necessary minor modifications to its permit to allow it to treat restricted wastes not previously specified in the permit (270.42(1)) ☒

D. LAND DISPOSAL FACILITY REQUIREMENTS N/A

1. The facility is not land disposing restricted wastes. ☒
2. The land disposal facility has records of notifications and certifications submitted by all applicable generators and storage and treatment facilities for each shipment of waste or waste treatment residue accepted for land disposal. (268.7(c)) ☒
3. The LDF has modified its waste analysis plan in accordance with the additional requirement of 268.7, referenced in 264.13 and 265.13. ☒
4. The LDF has adequately tested the wastes received using TCLP, applied knowledge, or both. (268.7(c)) ☒
5. The facility's written operating record has been modified, and now includes the documentation required by 264.73(b)(3)(10)(13)(14) or 265.73(b)(3)(8)(11)(12) ☒

Comments: Generator does not have documentation that land ban notification has been sent with each shipment.

Please mark boxes as shown ☒ In compliance ☐ In violation

Inspector's Signature Sam Wilson

Title ES-IV

Office NEPA





MICHIGAN DEPARTMENT  
OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

1979 as amended and Act 136 PA  
1969

Failure to file is punishable under  
Section 299 548 MCL or Section 10 of  
Act 136, PA 1969

Please print or type

Form Approved, OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.							
3. Generator's Name and Mailing Address Knapheide Manufacturing Company Highway 24 West; West Quincy, MO 63471						A. State Manifest Document Number MI 2139260									
4. Generator's Phone (217) 222-7131						B. State Generator's ID									
5. Transporter 1 Company Name Schiber Truck Company, Inc.						C. State Transporter's ID									
7. Transporter 2 Company Name						D. Transporter's Phone 618-254-2514									
9. Designated Facility Name and Site Address Petro-Chem 515 Lyncaste Detroit, MI 48214						E. State Transporter's ID									
10. US EPA ID Number MI D 9 8 0 6 1 5 2 9 8						F. Transporter's Phone									
						G. State Facility's ID									
						H. Facility's Phone 313-824-5835									
11. US DOT Description (including Proper Shipping Name, Hazard Class, and HM ID NUMBER)						12. Containers		13. Total Quantity		14. Unit		I. Waste No.		N/H	
a. "RQ" Waste Paint Related Material, Flammable Liquid, NA1263 (F003, F005)						006 D M		00330		G		F 0 0 3 F 0 0 5		H	
b.															
c.															
d.															
Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above						a/ /			
Approval #W116552												b/ /			
												c/ /			
												d/ /			
15. Special Handling Instructions and Additional Information Bill to: Heartland Environmental														EMERGENCY PHONE # 217-222-7134	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.  If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.															
Printed/Typed Name ORVILLE NIEDERS										Signature Orville Nieders			Date 01/21/59/1		
17. Transporter 1 Acknowledgement of Receipt of Materials										Date			Month Day Year		
Printed/Typed Name Gene Baugh										Signature Gene Baugh			Date 01/21/59/1		
18. Transporter 2 Acknowledgement of Receipt of Materials										Date			Month Day Year		
Printed/Typed Name										Signature			Date		
19. Discrepancy Indication Space															
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.															
Printed/Typed Name										Signature			Date		
													Month Day Year		

## MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality

Waste Management Program

P.O. Box 176 Jefferson City, Missouri 65102

314-751-3176

## HAZARDOUS WASTE MANIFEST

EMERGENCY RESPONSE  
U.S. COAST GUARD  
1 800 474-8802  
CHEM TREC  
1 800 474 9300  
DEPT. OF NATURAL RESOUR.  
214 634 2436

INSTRUCTIONS FOR THE COM-  
PLETION OF THIS FORM ARE ON A  
SEPARATE SHEET

THIS DOCUMENT MUST BE USED  
FOR ALL MISSOURI DESTINED  
SHIPMENTS

Please print or type (Form designed for use on elite (12-pitch) typewriter)

Form Approved. OMB No 2050-0038, Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MO00000766928	Manifest Document No. 191020	2. Page 1 of 1	Information in the shaded areas is required by State law.	
3. Generator's Name and Mailing Address Knapheide Manufacturing Company Highway 24 West; West Quincy, MO 63471			A. Missouri Manifest Document Number 004809		0008	
4. Generator's Phone 217 222-7131			B. G.S.I. (Gen. Site Address) 004809			
5. Transporter 1 Company Name Schiber Truck Company, Inc.			6. US EPA ID Number 118006493191		C. MO. Trans. ID H-1427	
7. Transporter 2 Company Name			8. US EPA ID Number		D. Transporter's Phone 618-254-2514	
9. Designated Facility Name and Site Address Continental Cement Company 3000 South Highway 79 Hannibal, MO 63401			10. US EPA ID Number MO00054018288		E. MO. Trans. ID R-188	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers Number Type		13. Total Quantity	
a. "RQ" Waste Xylene Mixture Flammable Liquid, UN 1307 (F003, F005)			0, 0, 1 TT		1, 4, 6, 7 G	
b.					EPA WASTE CODE STATE	
c.					EPA WASTE CODE STATE	
d.					EPA WASTE CODE STATE	
J. Additional Descriptions for Materials Listed Above			K. HANDLING CODE (FACILITY USE ONLY)			
a. Waste Paint and Thinner			INTERIM FINAL COMMENTS			
b.						
c.						
d.						
15. Special Handling Instructions and Additional Information Emergency Phone #						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.						
Printed/Typed Name			Signature		Month Day Year	
17. Transporter 1 Acknowledgement of Receipt of Materials			Signature		Date	
Printed/Typed Name			Signature		Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials			Signature		Date	
Printed/Typed Name			Signature		Month Day Year	
19. Discrepancy Indication Space						
20. Designated Facility Owner or Operator: Certification of receipt and handling of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name			Signature		Date	



MISSOURI DEPARTMENT OF NATURAL RESOURCES  
 GENERATOR'S HAZARDOUS WASTE REPORT SUMMARY SHEET

PAGE 1  
 OFFICE ONLY

DATE: 3-15-91  
 GENERATOR'S NAME: THE ENGLEBLOD MFG. CO.

ADDRESS: 100 S. 4TH ST. QUINCY, ILL. 62306

PHONE: (618) 242-1111

GENERATOR'S EMPLOYER: THE ENGLEBLOD MFG. CO.

GENERATOR'S EMPLOYEE: [REDACTED]

GENERATOR'S EMPLOYEE NUMBER: 000000766998

STATE: IL ZIP CODE: 62306

CITY: QUINCY

STREET ADDRESS: 100 S. 4TH ST.

ROUTE OF TRAVEL: HIGHWAY 120

NAME OF BUSINESS: THE ENGLEBLOD MFG. CO.

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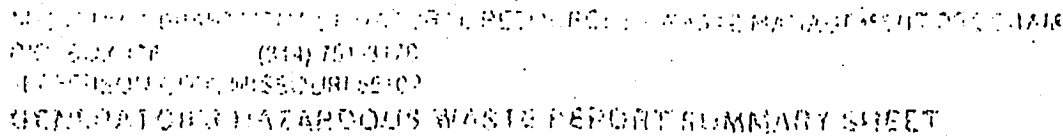
RECEIVED  
 APR 09 1991

WASTE MANAGEMENT PROGRAM  
 MISSOURI DEPARTMENT OF  
 NATURAL RESOURCES

I hereby declare, under penalty of law, that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE: HAROLD D. HIGGINS  
 DATE: 3-15-91

DNR HWG-11



PART II  
POLICE REPORT

NOTE - PUT THE READING CURSORS AND SET THE PRINT OR TYPE

End of month 11: The  $PLA_t$  must be enough to finance the total amount of loans requested of and to be repaid by the bank during the period 2006-2010. The  $PLA_t$  is the sum of the  $PLA_t$  of the individual projects.

● 歡迎各界人士踴躍投稿 ●

: FACILITY NAME: 1225 OFFICE LOCATION: 4000 WASTE WATERS CENTER

1. Each of the 45,000 members

CONTINENTAL CONTAINER CO.

11 0.0 0.2 6 0 1 8 | 2 8 .6

9-00000 TV SITE 100493

1713. 11/17/72. 0010

00000000000000000000000000000000

STATE

1990

1992

2125

63401

	8	9	10	11	12	13	14	15
	DESCRIPTION OF WASTE	DOT HAZARD CODE	CER HAZARDOUS WASTE NUMBER	PRIORITARY Hazardous (See Note)	TOTAL AMOUNT OF WASTE	Net Gross Weight	SPECIFIC GRAVITY	HANDLING CODE
1								
2	WASTE POLYMER MIXTURE	D	F 0 0 3		1550	16	1.8	101
3			F 0 1 5					
4								
5								
6								
7								
8								
9								
10								

	DISCOUNT NO	IS USED AND AMOUNT
a	1427	1 L 0 0 0 0 0 0 0 0 0 0
b		
c		
d		

## SECTIONS



ENVIRONMENTAL, INC. LABORATORY SERVICES DIVISION

March 12, 1991

Mr. Harold Huggins  
Knapheide Manufacturing Company  
436 South Sixth Street, P.O. Box C-140  
Quincy, Illinois 62301

RE: Analytical Results  
SCIE No. 91-1034

Dear Mr. Huggins:

SCI Environmental, Inc. (SCIE) is pleased to submit results of analytical testing performed on the samples submitted on February 18, 1991. The samples were analyzed for TCLP; EPA Method 1311 and Ignitability. There were no analytical problems encountered with the analysis.

If you have any questions or need further clarification, please do not hesitate to call.

Thank you for selecting SCI Environmental for your analytical testing needs.

Respectfully submitted,

*Elizabeth M. Cohoon*

Elizabeth M. Cohoon  
Laboratory Manager

EMC/jr/031291-2.1tr

Enclosure



ENVIRONMENTAL INC. LABORATORY SERVICES DIVISION

# DATA SUMMARY

Client: Knapheide Manufacturing Company  
435 South Sixth Street, P.O. Box C-140  
Quincy, Illinois 62301

Project No.: 91-1034

Sample Matrix: Filters

Date Sampled: 2/14/91

Date Received: 2/18/91

Date Analyzed: 3/4/91

EPA Method No.: 1311

Sampled By: SCIE

Sample Location: Knapheide

## TOXICITY CHARACTERISTIC LEACHATE PROCEDURE (TCLP)

SCIE Sample No.: 4310

Sample Identity: Paint Composite

Contaminant	Results (ppm)*	Regulatory Level (ppm)*
Arsenic	ND(**) < 0.1	5.0
Barium	0.19	100.0
Benzene	ND < 0.1	0.5
Cadmium	ND < 0.1	1.0
Carbon tetrachloride	ND < 0.01	0.5
Chlorobenzene	ND < 0.1	100.0
Chloroform	ND < 0.1	0.5
Copper	ND < 0.1	10.0
Cyanide	ND < 0.1	200
1,2-Dichlorobenzene	ND < 0.1	0.5
1,4-Dichlorobenzene	ND < 0.1	0.5
1,1-Dichloroethene	ND < 0.1	0.7
2,4-Dichlorophenol	ND < 0.1	0.13
Hexachlorobenzene	ND < 0.1	0.13
Hexachlorocyclopentadiene	ND < 0.1	0.5
Hexachloroethane	ND < 0.1	1.0
Lead	ND < 0.1	5.0
Manganese	ND < 0.001	0.5
Methylene chloride	9	0.5
Nitrobenzene	ND < 0.5	2.0
1,2,4-Trichlorobenzene	ND < 0.1	100.0
Perchloroethylene	ND < 2.0	5.0
Phenol	ND < 0.1	1.0
Silica	ND < 0.01	5.0
1,2,3-Trichlorobenzene	ND < 0.1	0.5
1,2,4-Trichlorobenzene	ND < 0.1	0.5
2,4,6-Trichlorophenol	ND < 10.0	0.5
2,4-Dichlorophenol	ND < 0.1	0.5
Vinyl chloride	ND < 0.1	2.0

\* ppm = parts per million

\*\* ND = None Detected above method detection limit



ENVIRONMENTAL, INC. LABORATORY SERVICES DIVISION

Page 2 of 2

Sample Number	Sample Identity	Ignitability (degrees F)
4310	Composite	> 200

Submitted By:

3/12/91

Date:

File: 1034TCLP.dta

*Elizabeth M. Cohoon*  
Elizabeth M. Cohoon  
Laboratory Manager





The Knapheide Mfg. Co. ■ 436 South Sixth Street ■ Box C-140 ■ Quincy, Illinois 62306-2140  
TEL: (217) 222-7131 ■ FAX: (217) 222-5939 OR (800) 654-8997

Northeast Regional Office  
Date Received

April 26, 1991

APR 29 '91

MR BRUCE MARTIN  
NORTH EAST REGIONAL OFFICE  
HAZARDOUS WASTE ENFORCEMENT UNIT  
205 JEFFERSON STREET  
P O BOX 176  
JEFFERSON CITY MO 65102

ADMU                       
APCU                       
PDWU                       
WMU                       
WPCU                       
Copies to:                     

Dear Sir:

In response to the letter from Sam Wilson Dated April 5, 1991,  
the actions listed below have/or will be put in place to address  
each recommendation.

- #1 That all hazardous waste manifests include the Missouri  
hazardous waste document number as required by MHWMC  
regulation 10 CSR 25-5.262(2)(B)2A.

The Knapheide Mfg. Co. will comply to this  
recommendation on all future manifests.

- A. When using Missouri Manifest forms the number  
will be placed in section "A".
- B. When using other states manifest forms the  
Missouri manifest Documentation number will  
be placed in a blank space at the top of this  
form.

- #2 That all hazardous waste manifests include the license  
plate number and state of issue of the waste-carrying  
portion of the transporting vehicle as required by  
MHWMC regulation 10 CSR 25-5.262(2)(B)2C.

The Knapheide Mfg. Co. will comply to this  
recommendation on all future manifests. This  
information will be located in section #15 of the  
hazardous waste manifest form.



SINCE 1848

NORTH EAST REGIONAL OFFICE  
HAZARDOUS WASTE ENFORCEMENT UNIT  
April 26, 1991  
Page 2

- #3 That all hazardous waste manifests include the transporter's Missouri ID number as required by MHWMC regulation 10 CSR 25-5.262(2)(B)2D.

The Knapheide Mfg. Co. will comply to this recommendation on all future manifests.

- A. When using Missouri manifest forms the transporter I.D. number will be placed in Section #C.
- B. When using other state manifest forms, the number will be placed in section number #15 (special handling instructions and additional information).

- #4 That all hazardous waste manifests for waste reported in gallons, liters, or cubic yards include the specific gravity for the waste as required by MHWMC regulation 10 CSR 25.5.262(2)(B)2I.

The Knapheide Mfg. Co. will comply to this recommendation on all future manifests. The specific gravity of all waste streams will be placed in section #J of the hazardous waste manifest form.

- #5 That all hazardous waste manifests include an alternate designated facility or instructions to the transporter to return the waste to the generator if it is undeliverable as required by MHWMC regulation 10 CSR 25-5.262(2) reference to 40 CFR 262.20 (C) and (D).

The Knapheide Mfg. Co. will comply to this recommendation on all future manifests. On all manifests the appropriate instruction will be placed in Section #15. (Special handling instructions and additional information.)



SINCE 1848

NORTH EAST REGIONAL OFFICE  
HAZARDOUS WASTE ENFORCEMENT UNIT  
April 26, 1991  
Page 3

- #6 That the generator maintain documentation at the facility that an appropriate land disposal restriction notification has been provided to the designated facility with each shipment of waste subject to land disposal restrictions as required by 40 CFR 268.7.

The Knapheide Mfg. Co. will comply to this recommendation on all future manifests. A copy of the land disposal restriction notification will be stapled to the hazardous waste manifest file copy and filed as usual.

- #7 That personal training documents kept on site include documentation of the hazardous waste director's qualifications or training as required by MHWMC regulation 10 CSR 25-5.262(2) referenced to 40 CFR 262.34 (a)(4) which references 40 CFR 265.16(d)(4).

The current hazardous waste director (Harold Huggins) has attended seminars relative to hazardous waste activities and recently completed a refresher training session. Documentation has been compiled (reference attachment A) and will be maintained on site.

- #8 That adequate aisle space be provided in all areas as required by MHWMC regulation 10 CFR 25-5.262(2) referenced to 40 CFR 262.34(a)(4) which references 40 CFR 265.35.

The Knapheide Mfg. Co. will comply to this recommendation with instructions to operators. Aisle lines have been painted on the floor to aid the fork lift operators in skid alignment.

- #9 That the contingency plan be updated to include current information as required by MHWMC regulation 10 CFR 25-5.262(2) referenced to 40 CFR 262.34(a)(4) which reference's 40 CFR 265.54.



SINCE 1848

NORTH EAST REGIONAL OFFICE  
HAZARDOUS WASTE ENFORCEMENT UNIT  
April 26, 1991  
Page 4

The Knapheide Mfg. Co. has complied to this recommendation as the contingency plan has been updated. See attachment #B.

- #10 That the generator determine if each waste stream is hazardous as required by MHWMC regulation 10 CFR 25-5.262(2) referenced to 40 CFR 262.11 at the time that the waste stream generation begins.

The Knapheide Mfg. Co. will comply to this recommendation on all new waste streams when the laboratory test data is available from the initial generation of the material.

- #11 That Knapheide comply with all provisions of MHWMC regulation 10 CFR 25-5.262(2) referenced to 40 CFR part 262 concerning the hazardous waste paint filters and over spray papers and submit written documentation to the department of natural resources showing the material was properly disposed of within 30 days of receipt of this report.

The report was received April 10, 1991. The Knapheide Mfg. Co. has several tests and disposal quotes in process. The disposition of this material is dependant upon the information received from testing and the time frame acceptable to vendors. The estimate for completion of vender response is April 30, 1991. We will keep you advised on the progress of this recommendation.

If you have questions concerning this response or I can be of further assistance, please give me a telephone call.

Sincerely,

THE KNAPHEIDE MFG. CO.

*Harold D Huggins*  
Harold Huggins  
Facilities Manager

cc: Sam Wilson  
Gerry Korb

ATTACHMENT A

HAZARDOUS WASTE DIRECTOR'S QUALIFICATIONS: (HAROLD HUGGINS)

- A. 2-15-90 QUINCY ILLINOIS  
ILLINOIS ENVIRONMENTAL REGULATORY UPDATE WORKSHOP  
QUINCY AREA SAFETY COUNCIL  
8 HOURS
- B. 5-24-90 JEFFERSON CITY, MISSOURI  
MISSOURI HAZARDOUS WASTE CONFERENCE  
ASSOCIATED INDUSTRIES OF MISSOURI  
8 HOURS
- C. 4-25-91 QUINCY ILLINOIS  
CERTIFICATE OF TRAINING  
MR. CLIFF METCALF (ENVIRONMENTAL CONSULTANT)  
8 HOURS

**T H I S   C E R T I F I E S**

**T H A T**

**HAROLD HUGGINS**

**HAS COMPLETED 8 HOURS OF REFRESHER TRAINING FOR HAZARDOUS WASTE ACTIVITIES UNDER REGULATIONS PURSUANT TO 40 CFR 265.16.**

**SPECIFIC TRAINING INCLUDED**

1. REGULATORY OVERVIEW/UPDATE
2. HAZARDOUS WASTE PROCEDURES
3. WASTE STREAM REVIEW
4. CONTINGENCY PLAN REVIEW

**DATE OF CERTIFICATION:  
APRIL 25, 1991**

**INSTRUCTOR:**

*C. L. Metcalf*  
C. L. Metcalf

## ATTACHMENT B

### HAZARDOUS WASTE: HANDLING AND DISPOSAL

#### I. General

A. The purpose of this procedure is to document the actions necessary to safely and expeditiously accumulate and dispose of those materials that are considered hazardous waste by The United State Environmental Protection Agency (EPA), The Missouri Department of Natural Resources, and The Illinois Environmental Protection Agency.

A further purpose of this procedure is to familiarize and train employees in waste handling procedures. Training will not only consist of familiarization with handling procedures, but also include actual experience with the tools and machines that are needed to implement them.

B. The expected results of this procedure are that those employees responsible for handling hazardous waste be aware of the kinds of waste being dealt with; the dangers involved with the different types of wastes; and know and follow all waste accumulation and disposal procedures.

#### II. Responsibility

##### FACILITIES MANAGER

Harold Huggins  
709 South 22nd Street  
Work: (217)-222-7131 (ext. 267)  
Home: (217) 222-0149

Has the responsibility for understanding the legal requirements involved in handling and disposing of hazardous waste and for monitoring performance against established standards. (Certified waste management trainer: Cliff Metcalf)

##### FABRICATION MANAGER AND WEST QUINCY PLANT MANAGER

Mark Gedstad - Fabrication  
5419 Greenbriar Avenue  
Work: (217)-222-7131 (ext. 335)  
Home: (217)-223-3345

Bryce Butler - West Quincy  
4300 King Drive  
Work: (217)-222-7131 (ext. 223)  
Home: (217)-222-4329



Responsible for supporting the programs that are established for handling and disposing of hazardous waste by communicating said programs to Production Managers and by insuring adherence to all related policies and procedures.

QUALITY CONTROL MANAGER

Orville Nieders

Responsible for physically tracking all hazardous waste, keeping an accurate inventory of all accumulated hazardous waste, preparing hazardous waste for disposal, and supervising the shipment of all hazardous waste including labeling and manifests. (Certified waste management trainer: Aqua Tech seminar-5/20/88)

PRODUCTION MANAGERS,

(See Appendix G)

Responsible for satellite storage areas within their departments, (Satellite locations - Appendix A), the condition of the containers which the waste is stored in, labeling of hazardous waste drums, and in addition the instruction and enforcement of all hazardous waste policies within their departments.

PAINTERS/MAINTENANCE WORKERS,

(See Appendix G)

Responsible for painting of drums with red primer to better indicate hazardous waste is contained within, labeling of empty drums to indicate contents, and fill start date. Also responsible for making sure that drums are not dented, leaking, and that the lids are tightly on the drums at all times, except when filling.

TRANSPORTERS (TOWMOTORS)

(See Appendix G)

Responsible for labeling of full drum to indicate waste type and date, transporting full drums from the satellite location to the hazardous waste containment facility ("waste building"), making sure barrels arrive safely and in the condition they were picked up in, and maintaining orderliness within the containment facility.

#### IV. Procedure

##### A. Definitions

A waste is defined as any solid, liquid or contained gaseous material that is no longer used, and either recycled, thrown away or stored until there is enough for disposal.

Hazardous wastes are those that could cause injury or death; or pollute land, air, or water.

There are two ways a waste can come under the hazardous waste regulatory system:

Listed Waste - Waste is considered hazardous if it appears on any of the four (4) lists of hazardous waste contained in the Resource Conservation and Recovery Act (RCRA).

Characteristic Waste - Even if a waste does not appear on one (1) of the EPA lists, it is considered hazardous if it is ignitable, corrosive or reactive. *OR TOXIC*

NOTE: Ignitable Waste is easily combustible or flammable. Most of the waste generated by The Knapheide Mfg. Co. fits into this category.

##### B. The Knapheide Mfg. Co. Waste Streams

Following is a list of wastes that are considered hazardous and that are controlled by this procedure. The Manager of Quality Control is to be notified before each new drum of waste is accumulated.

Paint Sludge - generated through the cleaning of paint systems (ie. lines, guns, etc.) with paint thinner. Waste should be accumulated in solid, undented, primer-red 55 gallon closed top drum with bung in the top. Waste is to be accumulated only to top ring of the barrel.

Tighten bung securely to prevent leakage. Then contact the Manager, Quality Control for removal to the waste building.

Used Paint Filters - are removed from paint booths and accumulated in solid, undented, primer red 55 gallon open top drums. Lids are placed on tightly and barrels are moved to the hazardous waste building and labeled. The Platform Assembly Manager is to see that filters are controlled. In his absence contact the Manager, Quality Control.

Paint Dust - is accumulated through the cleaning of dried overspray from the Company's paint booths. Paint dust should be placed in modified steel tubs with hinged lids. These containers will be painted yellow and will have red lettering to identify the material. The Manager, Quality Control is to be notified prior to paint booth cleaning to insure proper packaging of this material and removal from the facility.

Contaminated Paint Thinners - are thinners that are unusable for one reason or another. (ie. thinners contaminated by other materials, old thinners, etc). Material is to be placed in solid, undented, primer red 55 gallon closed top barrel and to be placed in container only to the top ring. The bung should be tightened securely to prevent leakage. Contact Manager, Quality Control for removal and storage in the Waste Building.

Waste Oil (Compressor & Transformers) - this material is accumulated as used oil in compressors and transformers are drained and changed. Waste oil from these two (2) sources should remain separated. The material should be placed in a primer red, closed top 55 gallon drum, filled to the top ring and capped tightly by installing top can cap seal. The Manager, Quality Control is to be notified to arrange for removal and storage in the Waste Building.

C. Start of Accumulation

1. Notify Manger, Quality Control that a new waste container needs to be prepared (i.e. solid waste cleaned out, barrel is painted primer red, etc.)
2. With Manager, Quality Control affix "Satellite Hazardous Waste" label. (See Appendix B). Make sure to include start fill date, type of waste, and the department which the waste is being accumulated in.

3. Next, the Manager, Quality Control will log all the necessary information on the "Waste Inspection Log". (See Appendix C).

D. Accumulation Process

1. At all times when the barrel is not being filled, the lid or cap must be fastened securely to the drum. This is especially important with paint-related wastes, as they are extremely flammable substances.
2. Make sure, through frequent visual checks, that the level of waste never exceeds a point 4" below the lid of the drum.
3. During the accumulation period, a weekly inspection will be made by the Manager, Quality Control. This inspection will include the following:

Drum Number	Leaking Containers
Correct Labels	Dents/Bulges
Deterioration of Containers	
Adequate Aisle Space	Date of Inspection
Correct Accumulation	Past 90 days
Start Date	Lids Secured

4. The "Waste Inspection Log" will be completed for each container of hazardous waste. Containers that are in unacceptable condition (i.e. dented, leaking, etc.) are to be replaced as soon as possible.
5. If a waste drum is still in the process of being filled after a period of 1 year from the start fill date, then report it to the Department Manager, who in turn will report it to the Manager, Quality Control. This is important, because of the fact that waste may only be stored at satellite locations for (1) one year.

E. Removal of Barrels to Waste Containment Storage Facility

1. When the waste drum has reached the limit to which it can be filled, contact Department Manager who will in turn contact the Manager, Quality Control.

2. Only designated towmotor drivers may pick up drums of hazardous waste. Do not attempt to move the waste by any other means.
3. Towmotor drivers need to be extremely careful in the transportation of barrels. Watch for potholes, bumps, and make sure that the towmotor doesn't run over any objects. (Note: Use only the designated "waste" pallets for transportation from the satellite location to the storage facility.)
4. When handling hazardous wastes, a communications device must be located in the immediate area (personal or forklift two-way radio is sufficient). This is to insure quick response in an emergency situation.
5. Before the drum is placed inside the storage facility, it must be assigned a number for shipping purposes. In addition, the "satellite hazardous waste" label will be removed and a "hazardous waste" label (Appendix D) will be filled out and attached to the drum before being placed inside the storage facility. (Use "waste inspection log" to get drum information.)

F. Organization Within the Storage Facility

1. After the waste drum has been cleared for storage inside the facility, it is to be off-loaded onto a hand cart to be taken inside the facility. The towmotor should not load the drums inside the building. The reason for this is that space is limited inside the building, and the risk of denting or piercing a drum with a towmotor is too great.
2. Drums are to be located inside the building by waste type. The different waste type areas are located inside the building. (See Appendix E)
3. No drums of differing waste types should be touching.
4. Only "Waste" pallets are to be used inside the building.
5. All drums must be on pallets.

6. Only 2 drum to a pallet.
7. Labels on all drums should be arranged so that they are visible from the center aisle.
8. Keep center aisle clear of debris, drums, and hand pallet.
9. Do not stack drums.
10. Allow at least 18" behind and in front of a pallet.

G. Disposing of Hazardous Waste

1. When any waste has accumulated for 60 days or when 15, or more containers of waste have been accumulated, arrangements will be made to transport the waste from our premises for disposal.
2. The Manager, Quality Control will provide the Facilities Manager with an inventory of all waste to be transported for disposal.
3. The Facilities Manager will fill out a "Hazardous Waste Manifest" (See Appendix F) in accordance with governmental regulations of all waste to be transported. The "Manifest" will then be mailed to the disposal company. The disposal company and the Facilities Manager will coordinate shipment dates.
4. When a shipment date has been arranged the Facilities Manager, will notify the Manager, Quality Control. Arrangements will be made to load the disposal company truck on the shipment date.
5. When the disposal company truck is loaded the Facilities Manager will verify the accuracy of the "Hazardous Waste Manifest" and sign same.
6. The Facilities Manager will maintain all records regarding Hazardous Waste transportation and disposal and make reports to governmental entities as necessary.

## Appendix A

### Satellite Fill Locations:

#### 1. Platform Assembly

Liquid Waste i.e. thinners, paint

#### 2. Hoist Assembly

Liquid Waste i.e. thinners, paint, wash prime  
Solid Waste i.e. paint sludge

#### 3. Standard U.B. (2 locations)

Liquid Waste i.e. thinners, paint, wash prime

#### 4. Tool Box

Liquid waste i.e. thinners, paint wash prime

#### 5. Accessory Booth (overhead)

Liquid waste i.e. thinners, paint wash prime

#### 6. Maintenance

Waste oil - degreased solvents  
compressor oils



(SATELLITE STORAGE)

HAZARDOUS

WASTE

START FILL. / /

TYPE.  
DEPT.

# WASTE INSPECTION LOG

CONDITION

LOCATION

DATE \_\_\_\_\_

NAME

Lids' Secure

Inside Gate Locked

Past - 90 Days

# HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE, OR

WST# 880056 PUBLIC SAFETY AUTHORITY, OR THE  
U.S. ENVIRONMENTAL PROTECTION AGENCY

PROPER U.S. DOT

DESCRIPTION "RQ" Waste Paint Related Material (F003, F005)  
Flammable Liquid; NA 1263

EPA WASTE # F003 F005

GENERATOR INFORMATION:

NAME Knapheide Mfg. Co.

ADDRESS Highway 24 West

CITY West Quincy STATE MO ZIP 634710000

EPA

ID NO. MOD000766998

EPA MANIFEST

DOCUMENT NO.

EPA

WASTE NO. ABOVE

SEE

ACCUMULATION

START DATE

STATE MANIFEST

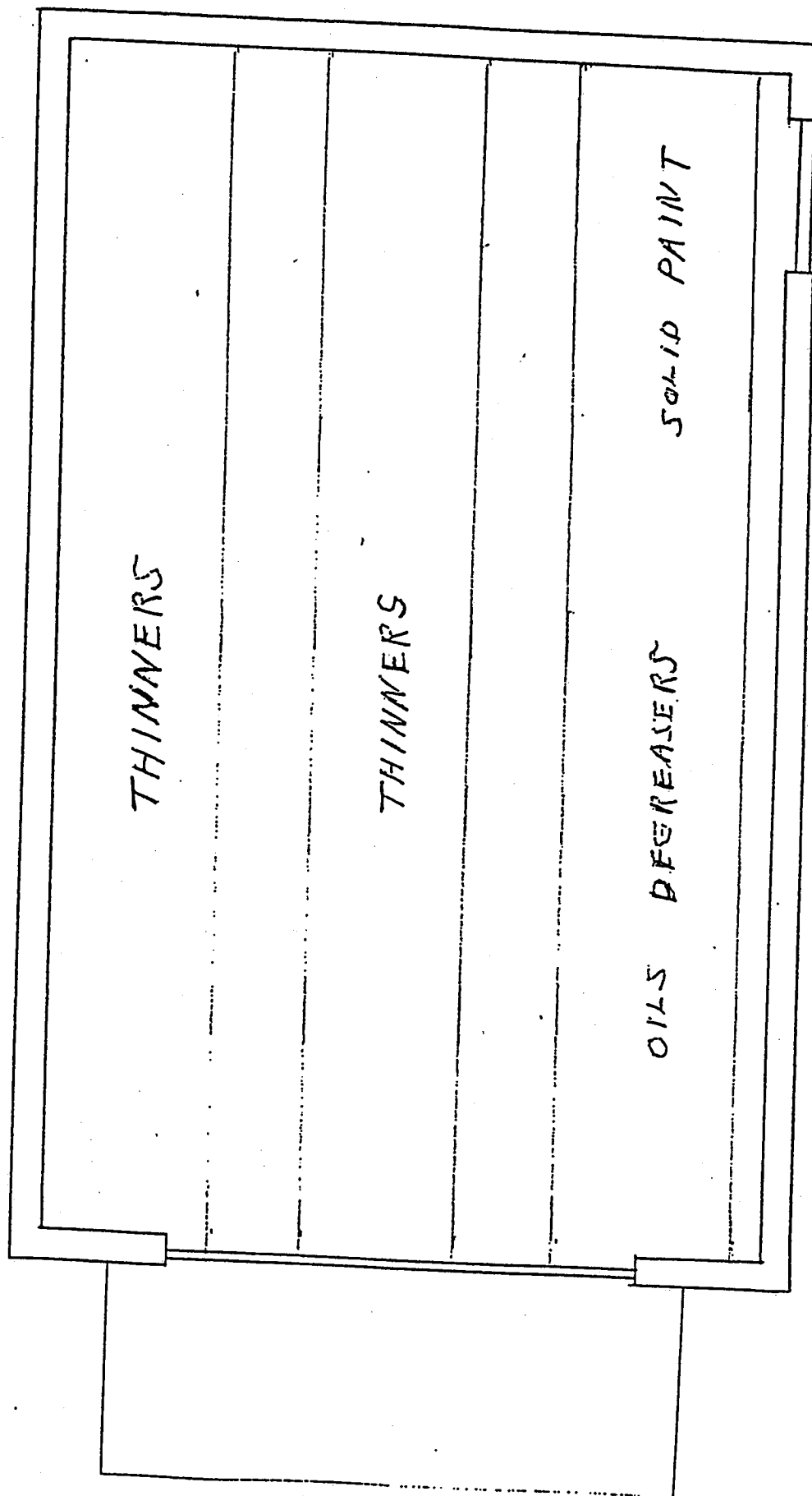
DOCUMENT NO.

MI 1566949

## HANDLE WITH CARE!

CONTAINS HAZARDOUS OR TOXIC WASTES

WASTE SEGREGATION AREAS



# APPENDIX F

## MISSOURI DEPARTMENT OF NATURAL RESOURCES HAZARDOUS WASTE MANIFEST FEDERAL SECTION INSTRUCTIONS Items 1 through 20

**THIS DOCUMENT MUST BE  
USED FOR ALL MISSOURI-  
DESTINED SHIPMENTS**

### GENERATORS

**Item 1. Generator's U.S. EPA ID Number — Manifest Document Number**

Enter the generator's U.S. EPA twelve digit identification number and the unique five digit number assigned to this Manifest (E.G., 00001) by the generator.

**Item 2. Page \_\_\_\_\_ of \_\_\_\_\_**

Enter the 1st page used then the total number of pages used to complete this manifest.

**Item 3. Generator's Name and Mailing Address.**

Enter the name and mailing address of the generator. The address should be the location that will manage the returned Manifest forms.

**Item 4. Generator's Phone Number**

Enter a telephone number where an authorized agent of the generator may be reached in the event of an emergency.

**Item 5. Transporter 1 Company Name**

Enter the company name of the first transporter who will transport the waste.

**Item 6. U.S. EPA ID Number**

Enter the U.S. EPA twelve digit identification number of the first transporter, identified in item 5.

**Item 7. Transporter 2 Company Name**

If applicable, enter the company name of the second transporter who will transport the waste. If more than two transporters are used to transport the waste, use a 2nd Manifest Sheet and list the transporters in the order they will be transporting the waste. Every transporter used between the generator and the designated facility must be listed.

**Item 8. U.S. EPA ID Number**

If applicable, enter the U.S. EPA twelve digit identification number of the second transporter identified in item 7.

**Item 9. Designated Facility Name and Site Address**

Enter the company name and site address of the facility designated to receive the waste listed on this Manifest. The address must be the site address, which may differ from the company mailing address.

**Item 10. U.S. EPA ID Number**

Enter the U.S. EPA twelve digit identification number of the designated facility identified in item 9.

**Item 11. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number (UN/NA))**

Enter the U.S. DOT Proper Shipping Name, Hazard Class, and ID Number (UN/NA) for each waste as identified in 49 CFR 171 through 177.

**Note —** If additional space is needed for waste descriptions, enter these additional descriptions in item 11 on a second Hazardous Waste Manifest Document.

**Item 12. Containers (No. and Type)**

Enter the number of containers for each waste and the appropriate abbreviation from Table I (below) for the type of container.

**Table I — Types of Containers**

DM — Metal drums, barrels, kegs  
DW — Wooden drums, barrels, kegs  
DF — Fiberboard or plastic drums, barrels, kegs  
TP — Tanks portable  
TT — Cargo tanks (tank trucks)  
TC — Tank cars  
DT — Dump truck  
CY — Cylinders  
CM — Metal boxes, cartons, cases (including roll-offs)  
CW — Wooden boxes, cartons, cases  
CF — Fiber or plastic boxes, cartons, cases  
BA — Burlap, cloth, paper or plastic bags

**Item 13. Total Quantity**

Enter the total quantity of waste described on each line.

**Item 14. Unit (Wt./Vol.)**

Enter the appropriate abbreviation from Table II (below) for the unit of measure.

**Table II — Units of Measure**

G — Gallons (liquids only)  
P — Pounds  
T — Tons (2000 lbs)  
Y — Cubic yards  
L — Liters (liquids only)  
K — Kilograms  
M — Metric tons (1000 kg)  
N — Cubic meters

**Item 15. Special Handling Instructions and Additional Information**

Generators may use this space to indicate special transportation, treatment, storage, or disposal information or Bill of Lading information. States may not require additional, new, or different information in this space. For international shipments, generators must enter in this space the point of departure (City and State) for those shipments destined for treatment, storage, or disposal outside the jurisdiction of the United States.

**Item 16. Generator's Certification**

The generator must read, sign (by hand), and date the certification statement. If a mode other than highway is used, the word "highway" should be lined out the appropriate mode (rail, water, or air) inserted in the space below. If another mode in addition to the highway mode is used, enter the appropriate additional mode (e.g., and rail) in the space below.

**Note —** All of the above information except the handwritten signature required in item 16 may be preprinted.

### TRANSPORTERS

**Item 17. Transporter 1 Acknowledgement of Receipt of Materials.**

Enter the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date or receipt. This signature shall be that of the actual driver.

**Item 18. Transporter 2 Acknowledgement of Receipt of Materials**

Enter, if applicable, the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date of receipt. This signature shall be that of the actual driver.

**Note — International Shipments — Transporter Responsibilities.**

**Exports —** Transporters must sign and enter the date the waste left the United States in item 15 of Form 8700-22.

**Imports —** Shipments of hazardous waste regulated by RCRA and transported into the United States from another country must upon entry be accompanied by the U.S. EPA Uniform Hazardous Waste Manifest. Transporters who transport hazardous waste into the United States from another country are responsible for completing the Manifest (40 CFR 263.10(c)(1)).

**Owners and Operators of Treatment, Storage, or Disposal Facilities**

**Item 19. Discrepancy Indication Space**

The authorized representative of the designated (or alternate) facility's owner or operator must note in this space any significant discrepancy between the waste described on the Manifest and the waste actually received at the facility.

Owners and operators of facilities located in unauthorized States (i.e., the U.S. EPA administers the hazardous waste management program) who cannot resolve significant discrepancies within 15 days of receiving the waste must submit to their Regional Administrator and also to the Missouri Department of Natural Resources, a letter with a copy of the Manifest at issue describing the discrepancy and attempts to reconcile it (40 CFR 264.72, 265.72, and 10 CSR 25-7.011).

Owners and operators of facilities located in Missouri, who cannot resolve the discrepancy within fifteen (15) days after receiving the waste the operator must promptly submit to the department a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest at issue.

**Item 20. Facility Owner or Operator; Certification of Receipt of Hazardous Materials Covered by This Manifest Except as Noted in Item 19.**

Print or type the name of the person accepting the waste on behalf of the owner or operator of the facility. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date of receipt.

## Appendix G

### DESIGNATED WASTE HANDLERS

#### Production Managers

1. Gary Mohr - U.B. Special (Ext. 244)
2. Ron Hubble - Side Assembly (Ext. 243)
3. Michael Dill - U.B. Standard (Ext. 240)
4. Bob Garnett - Platform (Ext. 242)
5. Dale Corrigan - 2nd Shift (Ext. 244)
6. Mike Houston - 2nd Shift (Ext. 240)
7. Ron Rathbun - Maintenance (Ext. 249)

#### Painters/Maintenance

1. Ed VanSickle
2. Mervin Lay
3. Carlie Crandall
4. Terry Olson
5. Richard Fenton
6. Leo Dunnoven
7. David Burbridge
8. Scott Wingerter
9. John Barger
10. Ron Lewis
11. Kim Spangler
12. John VanOrder
13. Todd Platt
14. Jon Turner
15. Ed Eaton

#### (Alternates)

Harold Hayes  
Norm Wright  
Butch O'Brien  
Lynn Sly  
Mike Dillon  
Roger Fast  
Mike Ray  
Michael Schoopman  
Daryl Bartz

#### Towmotor Operators

1. Dale Stewart
2. Dennis Totsch
3. Ray Alexander
4. Harm Kauffman
5. Dan Wiskirchen

John Sly  
Andy Sullivan  
Randy Rout  
John Koettters  
Rocky Murry

# Hazardous Waste Handler Training Certification

## SPILL PROCEDURE

### A. Minor

In event of a spill of this type, the following actions should happen:

1. Employee to notify their foreman

2. The foreman will:

- Have area roped off
- Have remaining good material put in new drums
- Have absorbent put on material
- Have unuseable material put in drum, labeled and moved to designated storage area
- Notify Safety Director
- The Safety Director will assign number for inspection log and make arrangements for disposal

### B. "Major"

In event of a spill of this type, the following actions should happen:

1. Employee to notify their foreman

2. The foreman will:

- Evacuate employees from the area
- Use plant emergency plan as required
- Notify Safety Director
- The Safety Director will notify all emergency organizations as required, Fire Dept., Riedel Services, etc.
- Coordinate plant employee involvement
- Complete forms/paperwork to document problem and disposition of material



# HAZ WASTE HANDLING TRAINING

SESSION #1 Wed. Feb. 14  
3:15 p.m.  
W.Q. Lunchroom

Mike Dill  
Bill Greving  
John Bartz  
Eddie Maples

Ed Van Sickle  
Trudy Wheeler  
Mervin Lay  
Steve Savage  
Buck Friday  
Leo Duniven  
Roger Fast  
Butch Earel  
Ron Gilbert  
Ray Alexander  
Steve Root  
Bill Shear  
Dave Kline  
Dale Stewart  
Bob Dowell

## SESSION #3

Jon Wren

John Van Order  
George Johnson  
Todd Platt  
Rusty Kaylor  
Rick Miller  
Kelly Naderhoff  
Andy Sullivan  
Dan Wiskirchen  
George Ellsworth

SESSION #2 Thurs. Feb 15  
3:15 p.m.  
W.Q. Lunchroom

Dan Asbury  
Ron Hubble  
Gary Mohr  
Ron Rathbun

Norman Wright  
Carlie Crandall  
Harold Hays  
Harm Kaufman  
Richard Fenton  
David Burbridge  
Michael Ray  
Scott Wingerter  
Mike Shoopman  
Lynn Sly  
John Barger  
Daryl Bartz  
Butch O'Brien  
Steve Potter  
John Sly  
Mike Dillon  
Don Powers  
John Whitaker  
David Whittaker

## SESSION #4

John Wente  
Dale Corrigan

Doug Carper  
Tim Nutt  
Curtis Moore  
Les Garrett  
Tom Kitch  
Mike McCallister  
Jerry Barnes  
Sam Smith

SESSION #5    Thurs.    Feb 15    7:00 a.m. W.Q. Lunchroom

Mike Houston  
Bruce Orr

Tom Pitford  
Randy Sly  
Lonnie Shipe  
Clinton Kirchner  
Terry Ensminger  
John Moyers

John Smith  
Mike Boling  
Dennis Totsch  
Ron Lewis  
Todd Dolbeare

BC/wp\pltraini



The Knapheide Mfg. Co. ■ 436 South Sixth Street ■ Box C-140 ■ Quincy, Illinois 62306-2140  
TEL: (217) 222-7131 ■ FAX: (217) 222-5939 OR (800) 654-8997

Northeast Regional Office  
Date Received

MAY 29 '91

May 28, 1991

Route:

ADMU \_\_\_\_\_  
APCU \_\_\_\_\_  
PDWU \_\_\_\_\_  
WMU \_\_\_\_\_  
WPCU \_\_\_\_\_  
Copies to: \_\_\_\_\_

MR BRUCE MARTIN  
NORTH EAST REGIONAL OFFICE  
HAZARDOUS WASTE ENFORCEMENT UNIT  
205 JEFFERSON STREET  
P O BOX 176  
JEFFERSON CITY MO 65102

Dear Sir:

This is an update to our April 26, 1991 response to the letter from Sam Wilson dated April 5, 1991. The two actions listed below have additional requirements that have/or will be put in place to complete these recommendations.

- #9 That the contingency plan be updated to include current information as required by MHWMC regulation 10 CFR 25-5.262(2) referenced to 40 CFR 262.34(a)(4) which reference's 40 CRF 265.54.

The Knapheide Mfg. Co. has complied to this recommendation as the contingency plan has been updated. See Attachment #B.

Per my telephone conversation with Sam Wilson after his review of Attachment B, the Facility Manager will be listed as the Emergency Coordinator with the Quality Control Manager alternate. Revised sheets are attached.

- #11 That Knapheide comply with all provisions of MHWMC regulation 10 CFR 25-5.262(2) referenced to 40 CFR 262 concerning the hazardous waste paint filters over spray papers and submit written documentation to the Department of Natural Resources showing the material was properly disposed of within 30 days receipt of this report.



SINCE 1848

MR BRUCE MARTIN  
HAZARDOUS WASTE ENFORCEMENT UNIT  
May 28, 1991  
Page 2

The report was received April 10, 1991. The Knapheide Mfg. Co. has several tests and disposal quotes in process. The disposition of this material is dependant upon the information received from testing and the time frame acceptable to vendors. The estimate for completion of vender response is April 23, 1991. We will keep you advised on the progress of this recommendation.'

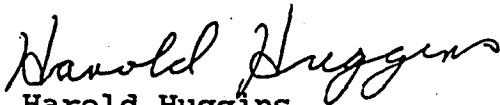
With testing complete, it was decided not practical to separate the vinyl wash filters. Knapheide then contracted with Tri-Rense Inc. of St. Louis to consolidate the drums. Label for transportation via Chief Trucking, and to be incinerated via fuels blending at Chief Supply in Tulsa, Oklahoma.

Consolidation work was started May 21, 1991 and completed on May 24, 1991. Transportation was started May 22, 1991 and completed on May 24, 1991.

If you have questions concerning this response or I can be of further assistance, please give me a telephone call.

Sincerely,

THE KNAPHEIDE MFG. CO.

  
Harold Huggins  
Facilities Manager

HH:dd

cc: Sam Wilson  
Gerry Korb

CERTIFIED NUMBER P 574 404 204

## ATTACHMENT B

### HAZARDOUS WASTE: HANDLING AND DISPOSAL

#### I. General

A. The purpose of this procedure is to document the actions necessary to safely and expeditiously accumulate and dispose of those materials that are considered hazardous waste by The United State Environmental Protection Agency (EPA), The Missouri Department of Natural Resources, and The Illinois Environmental Protection Agency.

A further purpose of this procedure is to familiarize and train employees in waste handling procedures. Training will not only consist of familiarization with handling procedures, but also include actual experience with the tools and machines that are needed to implement them.

B. The expected results of this procedure are that those employees responsible for handling hazardous waste be aware of the kinds of waste being dealt with; the dangers involved with the different types of wastes; and know and follow all waste accumulation and disposal procedures.

#### II. Responsibility

##### FACILITIES MANAGER

Harold Huggins  
709 South 22nd Street  
Work: (217)-222-7131 (ext. 267)  
Home: (217) 222-0149

Has the responsibility for understanding the legal requirements involved in handling and disposing of hazardous waste and for monitoring performance against established standards. Emergency Coordinator (Certified waste management trainer: Cliff Metcalf)

##### FABRICATION MANAGER AND WEST QUINCY PLANT MANAGER

Mark Gedstad - Fabrication  
5419 Greenbriar Avenue  
Work: (217)-222-7131 (ext. 335)  
Home: (217)-223-3345

Bryce Butler - West Quincy  
4300 King Drive  
Work: (217)-222-7131 (ext. 223)  
Home: (217)-222-4329

Responsible for supporting the programs that are established for handling and disposing of hazardous waste by communicating said programs to Production Managers and by insuring adherence to all related policies and procedures.

QUALITY CONTROL MANAGER

Orville Nieders

Responsible for physically tracking all hazardous waste, keeping an accurate inventory of all accumulated hazardous waste, preparing hazardous waste for disposal, and supervising the shipment of all hazardous waste including labeling and manifests. Alternate Emergency Coordinator (Certified waste management trainer: Aqua Tech seminar-5/20/88)

PRODUCTION MANAGERS,

(See Appendix G)

Responsible for satellite storage areas within their departments, (Satellite locations - Appendix A), the condition of the containers which the waste is stored in, labeling of hazardous waste drums, and in addition the instruction and enforcement of all hazardous waste policies within their departments.

PAINTERS/MAINTENANCE WORKERS,

(See Appendix G)

Responsible for painting of drums with red primer to better indicate hazardous waste is contained within, labeling of empty drums to indicate contents, and fill start date. Also responsible for making sure that drums are not dented, leaking, and that the lids are tightly on the drums at all times, except when filling.

TRANSPORTERS (TOWMOTORS)

(See Appendix G)

Responsible for labeling of full drum to indicate waste type and date, transporting full drums from the satellite location to the hazardous waste containment facility ("waste building"), making sure barrels arrive safely and in the condition they were picked up in, and maintaining orderliness within the containment facility.

## Spill Procedure

### A. Minor

In event of a spill of this type, the following actions should happen:

1. Employee to notify their foreman
2. The foreman will:
  - Have area roped off
  - Have remaining good material put in new drums
  - Have absorbent put on material
  - Have unusable material put in drum, labeled and moved to designated storage area
  - Notify Facilities Manager
  - The Facilities Manager will assign number for inspection log and make arrangements for disposal

### B. "Major"

In event of a spill of this type, the following actions should happen:

1. Employee to notify their foreman
2. The foreman will:
  - Evacuate employees from the area
  - Use plant emergency plan as required
  - Notify Facilities Manager
  - The Facilities Manager will notify all emergency organizations as required, Fire Dept., Riedel Services, etc.
  - Coordinate plant employee involvement
  - Complete forms/paperwork to document problem and disposition of material

INSTRUCTIONS FOR THE COMPLETION OF THIS FORM ARE ON A SEPARATE SHEET.

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS.

# MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality

Waste Management Program

P.O. Box 176 Jefferson City, Missouri 65102

314-751-3176

## HAZARDOUS WASTE MANIFEST

EMERGENCY RESPONSE

U.S. COAST GUARD

1-800-424-8802

CHEM TREC

1-800-424-9300

DEPT. OF NATURAL RESOURCES

314-634-2438

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039, Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. M O D 0 0 0 7 6 6 9 9 8	Manifest Document No. 111 1 3 3	2. Page of 1	Information in the shaded areas is required by State law.
3. Generator's Name and Mailing Address The Knapheide Mfg. Co. 436 S. Sixth Street Quincy, IL 62301		4. Generator's Phone ( ) 217-222-7131		A. Missouri Manifest Document Number 0 0 4 3 0 9	
5. Transporter 1 Company Name Chief Supply, Inc.		6. US EPA ID Number O K D 0 8 9 7 6 1 2 9 0		B. G.S.P. (Gen. Site Address) Hwy 24 West Quincy, MO 63471	
7. Transporter 2 Company Name		8. US EPA ID Number		C. MO Trans. ID H-1623 (OK3074)	
9. Designated Facility Name and Site Address Chief Supply, Inc. Rt. 2, Box 71 Haskell, OK 74436		10. US EPA ID Number O K D 0 8 9 7 6 1 2 9 0		D. Transporter's Phone 918-482-5271	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers Number Type		13. Total Quantity	14. Unit W/Vol.
a. R.Q. Waste Flammable Solid N.O.S. UN-1925 (Methyl Ethyl Ketone)		172 DM		3700	g
b.					
c.					
d.					
15. Special Handling Instructions and Additional Information Item 11a: Refer to US D.O.T. 1990 Emergency Response Guidebook, Guide #26 If material is not deliverable, return to generator. 24 Hour Emergency Phone: 217-222-7131		HANDLING CODE (FACILITY USE ONLY) RECEIVED INTERIM FINAL		COMMENTS	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.		Printed/Typed Name H. H. H. H. H.		Signature H. H. H. H. H.	
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name H. H. H. H. H.		Signature H. H. H. H. H.	
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature	
19. Discrepancy Indication Space					
20. Designated Facility Owner or Operator: Certification of receipt and handling of hazardous materials covered by this manifest except as noted in item 19.		Date Month Day Year			



INSTRUCTIONS FOR THE COM-  
PLETION OF THIS FORM ARE ON A  
SEPARATE SHEET.

THIS DOCUMENT MUST BE USED  
FOR ALL MISSOURI-DESTINED  
SHIPMENTS.

# MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality

Waste Management Program

P.O. Box 176 Jefferson City, Missouri 65102

314-751-3176

## HAZARDOUS WASTE MANIFEST

EMERGENCY RESPONSE  
U.S. COAST GUARD  
1-800-424-8802  
CHEM TREC  
1-800-424-9300  
DEPT. OF NATURAL RESOURCES  
314-634-2436

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039, Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MOD000766998	Manifest Document No. 0000000000	2. Page of 1	Information in the shaded areas is required by State law.	
3. Generator's Name and Mailing Address The Knapheide Mfg. Co. 436 S. Sixth Street Quincy, IL 62301			A. Missouri Manifest Document Number 004309			
4. Generator's Phone ( ) 217-222-7131			B. G.S.E. (Gen. Site Address) Hwy. 24 Near Quincy, MO 63471			
5. Transporter 1 Company Name Chief Supply, Inc.			C. MO Trans ID H-1623 (OK3074)			
6. US EPA ID Number DKD089761290			D. Transporter's Phone 1-800-482-3221			
7. Transporter 2 Company Name			E. MO Trans ID			
8. US EPA ID Number			F. Transporter's Phone			
9. Designated Facility Name and Site Address Chief Supply, Inc. Rt. 2, Box 71 Haskell, OK 74436			G. State Facility's ID 3573015			
10. US EPA ID Number DKD089761290			H. Facility's Phone 1-800-482-3221			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers	13. Total Quantity	14. Unit
a. R.Q. Waste Flammable Solid N.O.S. UN01925 (Methyl Ethyl Ketone) UN/325				Number 172	Type DM	Quantity 38710 S
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above				K. HANDLING CODE (FACILITY USE ONLY)		
a. D-007				a.		
b.				b.		
c.				c.		
d.				d.		
15. Special Handling Instructions and Additional Information Item 11a: Refer to US D.O.T. 1990 Emergency Response Book, Guide #26 If material is not deliverable, return to generator. 24 Hour Emergency Phone# 217-222-7131						
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Printed/Typed Name H. J. ...			Signature H. J. ...		Month Day Year 05/21/91	
17. Transporter 1 Acknowledgement of Receipt of Materials			Signature T. J. ...		Date 05/21/91	
18. Transporter 2 Acknowledgement of Receipt of Materials			Signature		Date	
19. Discrepancy Indication Space						
20. Designated Facility Owner or Operator: Certification of receipt and handling of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name			Signature		Date	

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MISSOURI DEPARTMENT OF NATURAL RESOURCES  
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P.O. Box 176 Jefferson City, Missouri 65102  
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EMERGENCY RESPONSE  
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314-634-2436

# HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039, Expires 9-30-91

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>M.O.D.0.0.0.7.6.6.9.9.8.9.1.0.2.5</b>		Manifest Document No. <b>1025</b>		2. Page of <b>1</b>		Information in the shaded areas is required by State law.					
3. Generator's Name and Mailing Address <b>The Knapheide Mfg. Co. 436 S. Sixth Street Quincy, IL 62301 217-222-7131</b>						A. Missouri Manifest Document Number <b>0.0.4.8.0.9.0.0.1.3</b>							
4. Generator's Phone ( )						B. G.S. (Gen. Site Address) <b>West Quincy, MO 63471</b>							
5. Transporter 1 Company Name <b>Chief Supply, Inc.</b>						6. US EPA ID Number <b>OKD089761290</b>							
7. Transporter 2 Company Name						8. US EPA ID Number							
9. Designated Facility Name and Site Address <b>Chief Supply, Inc. Rt. 2, Box 71 Haskell, OK 74436</b>						10. US EPA ID Number <b>OKD089761290</b>							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers Number Type		13. Total Quantity		14. Unit Wt/Vol.			
a. <b>R.Q. Waste Flammable Solid N.O.S. UN-1925 (Methyl Ethyl Ketone) UN-1325</b>						1.73 DM		337.25		P S			
b.										EPA WASTE CODE STATE			
c.										EPA WASTE CODE STATE			
d.										EPA WASTE CODE STATE			
15. Special Handling Instructions and Additional Information <b>Item 11a: Refer to US D.O.T. 1990 Emergency Response Guidebook Guide #26 If material is not deliverable, return to generator. 24 Hour Emergency Phone# 217-222-7131</b>						HANDLING CODE (FACILITY USE ONLY) INTERIM FINAL COMMENTS							
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Printed/Typed Name <b>L.C. White</b>						Signature <i>L.C. White</i>		Month <b>05</b>		Day <b>22</b>		Year <b>91</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials						Signature <i>L.C. White</i>		Month <b>05</b>		Day <b>22</b>		Year <b>91</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials						Signature		Month		Day		Year	
19. Discrepancy Indication Space													
20. Designated Facility Owner or Operator: Certification of receipt and handling of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name						Signature		Month		Day		Year	

GENERATOR

TRANSPORTER

FACILITY

GENERATOR COPY - PART 6

IMPORTANT

SEE INSTRUCTIONS SHOULD PART 1 & 2 FAIL TO RETURN WITHIN 30 DAYS

INSTRUCTIONS FOR THE COM-  
PLETION OF THIS FORM ARE ON A  
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MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality

Waste Management Program

P.O. Box 176 Jefferson City, Missouri 65102

314-751-3176

HAZARDOUS WASTE MANIFEST

EMERGENCY RESPONSE

U.S. COAST GUARD

1-800-424-8802

CHEM TREC

1-800-424-9300

DEPT. OF NATURAL RESOURCES

314-634-2438

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039, Expires 9-30-91

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>M.O.D.0.0.0.7.6.6.9.9.8.9.1.0.2.6</b>		Manifest Document No. <b>0.0.4.8.0.9.0.0.1.4</b>		2. Page <b>1</b> of <b>1</b>		Information in the shaded areas is required by State law.	
3. Generator's Name and Mailing Address <b>The Knapheide Mfg. Co. 436 S. Sixth Street Quincy, IL 62301 217-222-7131</b>				A. Missouri Manifest Document Number <b>0.0.4.8.0.9.0.0.1.4</b>		B. G.S.N. (Gen Site Address) <b>Hwy 24 West Quincy, MO 63471</b>		C. MO Trans ID <b>H-1623 (OK3074)</b>	
4. Generator's Phone ( )				6. US EPA ID Number <b>O.K.D.0.8.9.7.6.1.2.9.0</b>		D. Transporter's Phone <b>918-482-5271</b>		E. MO Trans ID	
5. Transporter 1 Company Name <b>Chief Supply, Inc.</b>				8. US EPA ID Number		F. Transporter's Phone		G. State Facility's ID <b>3573015</b>	
7. Transporter 2 Company Name				10. US EPA ID Number <b>O.K.D.0.8.9.7.6.1.2.9.0</b>		H. Facility's Phone <b>918-482-5271</b>			
9. Designated Facility Name and Site Address <b>Chief Supply, Inc. Rt. 2, Box 71 Haskell, OK 74436</b>									
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers Number Type		13. Total Quantity		14. Unit W/Vol.	
a. <b>XXXX X R.W. Waste Flammable Solid N.O.S. UN-1925 (Methyl Ethyl Ketone) UN 1925</b>				1.72 DM		43000		P S	
b.									
c.									
d.									
15. Special Handling Instructions and Additional Information <b>Item 11a: Refer to US D.O.M. 1990 Emergency Response Guidebook Guide #26 If material is not deliverable, return to generator. 24 Hour Emergency Phone #217-222-7131</b>				HANDLING CODE (FACILITY USE ONLY)		INTERIM		FINAL	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.				Printed/Typed Name <b>HAZARD 11/1/1995</b>		Signature <i>Handwritten Signature</i>		Month Day Year <b>11 23 91</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials				Printed/Typed Name <b>CHIEF SUPPLY</b>		Signature <i>Handwritten Signature</i>		Month Day Year <b>11 23 91</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials				Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space									
20. Designated Facility Owner or Operator: Certification of receipt and handling of hazardous materials covered by this manifest except as noted in Item 19.				Printed/Typed Name		Signature		Month Day Year	



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MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality

Waste Management Program

P.O. Box 176 Jefferson City, Missouri 65102

314-751-3176

EMERGENCY RESPONSE

U.S. COAST GUARD

1-800-424-8802

CHEM TREC

1-800-424-9300

DEPT. OF NATURAL RESOURCES  
314-634-2436

HAZARDOUS WASTE MANIFEST

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Form Approved. OMB No. 2050-0039, Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is required by State law.	
3. Generator's Name and Mailing Address The Knapheide Mfg. Co. 436 S. Sixth Street Quincy, IL 62301		4. Generator's Phone 217-222-7131		A2 Missouri Manifest Document Number 00048090016		
5. Transporter 1 Company Name Chief Supply, Inc.		6. US EPA ID Number DKD089761290		B2 Missouri Site Address Hwy. 24 West Quincy, MO 63471		
7. Transporter 2 Company Name		8. US EPA ID Number		C2 Missouri Trans ID B-1623 (OK3074)		
9. Designated Facility Name and Site Address Chief Supply, Inc. Rt. 2, Box 71 Haskell, OK 74436		10. US EPA ID Number DKD089761290		D2 Transporter's Phone 918-482-5271		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol.	
a. R.Q. Waste Flammable Solid N.O.S. UN 1925 (Methyl Ethyl Ketone) UN 1925		Number Type				
J. Additional Descriptions for Materials Listed Above		HANDLING CODE (FACILITY USE ONLY)				
a. D-007		INTERIM				
b.		FINAL				
c.		COMMENTS				
d.						
15. Special Handling Instructions and Additional Information Item 11a: Refer to US D.O.T. 1990 Emergency Response Guidebook Guide #26 If material is not deliverable, return to generator. 24 Hour Emergency Phone # 217-222-7131						
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Printed/Typed Name Michael D. Hylleberg		Signature Michael D. Hylleberg		Month Day Year 05/23/91		
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature T. Hylleberg		Date 05/23/91		
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Date		
Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						
20. Designated Facility Owner or Operator: Certification of receipt and handling of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name		Signature		Date		

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Division of Environmental Quality

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HAZARDOUS WASTE MANIFEST

EMERGENCY RESPONSE

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CHEM TREC

1-800-424-9300

DEPT. OF NATURAL RESOURCES

314-634-2438

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Form Approved, OMB No. 2050-0039, Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page	Information in the shaded areas is required by State law.	
3. Generator's Name and Mailing Address The Knapheide Mfg. Co. 436 S. Sixth Street Quincy, IL 62301		MOD000766998		1	A. Missouri Manifest Document Number 0048090016	
4. Generator's Phone ( )		217-222-7131			B. G.S.N. (Gen. Site Address) Hwy 24 West Quincy, MO 63471	
5. Transporter 1 Company Name Chief Supply		6. US EPA ID Number OKD089761290			C. MO Trans. ID H-1623 (OK3074)	
7. Transporter 2 Company Name		8. US EPA ID Number			D. Transporter's Phone 918-482-5271	
9. Designated Facility Name and Site Address Chief Supply, Inc. Rt. 2, Box 71 Haskell, OK 74436		10. US EPA ID Number OKD089761290			E. MO Trans. ID	
					F. Transporter's Phone	
					G. State Facility ID 3573015	
					H. Facility's Phone 918-482-5271	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol.	15. Waste No.
a. R.Q. Waste Flammable Solid N.O.S. UN1325 (Methyl, Ethyl Ketone)		121 DM		36300	P	EPA WASTE CODE D 100 1
b.						EPA WASTE CODE D 100 2
c.						EPA WASTE CODE D 100 2
d.						EPA WASTE CODE D 100 2
16. Additional Descriptions for Materials Listed Above		HANDLING CODE (FACILITY USE ONLY)		COMMENTS		
a. D-007		INTERIM				
b.						
c.						
d.						
15. Special Handling Instructions and Additional Information Item 11a: Refer to US D.O.T. 1990 Emergency Response Guidebook Guide #26 If material is not deliverable, return to generator. 24 Hour Emergency Phone # 217 222-7134						
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Printed/Typed Name HAROLD HUBBARD		Signature Harold Hubbard		Month Day Year 5/1/91		
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature Steve Myers		Date 5/1/91		
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Date		
19. Discrepancy Indication Space						
20. Designated Facility Owner or Operator: Certification of receipt and handling of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name		Signature		Date		

GENERATOR COPY - PART 6

IMPORTANT

SEE INSTRUCTIONS SHOULD PART 1 & 2 FAIL TO RETURN



STATE OF MISSOURI  
OFFICE INFORMATION MEMO

DATE

5-09-91

TIME ☐ AM ☒ PM

1515

TO

Sam Wilson

DEPARTMENT OR DIVISION

W

FROM

Steve

DEPARTMENT

RE:

☐ TAKE NECESSARY ACTION

☐ FOR YOUR APPROVAL

☐ REPLY

☐ FOR YOUR COMMENTS

☐ FOR YOUR INFORMATION

☐ PER YOUR REQUEST

☐ RETURN

☐ FILE

☐ FOR YOUR SIGNATURE

☐ PREPARE FOR MY SIGNATURE

Harold AUGERIS, Krapchide called:

Tri-Purse in St. Louis, to (filter)  
Consolidate and send to a  
waste fuels outfit in Okla.

Both hazardous & non-hazardous.

Agree to start May 20th.

Decided not to try and separate  
filters into hazardous & non-hazardous.

He will confirm by letter, should  
have final start date by tomorrow.

8:10 AM

TELEPHONE OR CONFERENCE RECORD

File 3,800 Marion

Date 3/27/91

TELEPHONE CALL

CONFERENCE

Incoming (✓)

Field ( )

Outgoing ( )

Office ( )

SUBJECT

Waste paint filters stored  
at Knapheide, West Quincy, MO.

PERSONS INVOLVED

Name

Representing

Harold Huggins

Knapheide

Don Head

DNR-NERO

SUMMARY OF CONVERSATION

Mr. Huggins said they met with Mike Stansfield, DNR-APCP, in Jefferson City on 3/26/91 to discuss the possibility of burning the non-hazardous waste paint filters in an incinerator on-site. APCP didn't think there would be a problem as long as Knapheide applies for a permit and as long as the hazardous waste paint filters (Vinyl-wash green) are separated and shipped to a hazardous waste TSD facility within 90 days of the date they were determined to be hazardous. Mr. Huggins said they would be meeting with the incinerator manufacturer to make sure it will meet APCP requirements and would be submitting an application for a permit by Monday 4-1-91. He said to have Sam Wilson give him call if he wants a letter from Knapheide to confirm or if he has further questions.

(OVER)

Don H

DEPARTMENT OF NATURAL RESOURCES  
Division of Environmental Quality

DIVISION OF ENVIRONMENTAL QUALITY  
MADISON REGIONAL OFFICE  
DATE RECEIVED

DEC 15 1989

TELEPHONE OR CONFERENCE RECORD

File Knapheide, Inc. (West Quincy)

Date 12-7-89

WQ S&WCD R.A. LR  
SW LAD  
3:00 PM  
Knapheide

TELEPHONE

CONFERENCE

Incoming (x)

Field ( )

Outgoing ( )

Office ( )

SUBJECT Complaint Concerning Withdrawal of Enforcement Discretion for  
Knapheide's Reactive Paint Filters

PERSONS INVOLVED

Name

Representing

Mr. Harold Huggins, Mr. Jim Frieden,  
Mr. Mike Bratton  
Mr. Tom Judge

Knapheide  
MDNR - WMP

SUMMARY OF CONVERSATION

Knapheide had been burning filters from their paint booths in a solid waste incinerator, under enforcement discretion, because they spontaneously combust or explode when stored. I explained how this has placed them in a privileged position with regard to others who generate and burn/incinerate hazardous waste. I told them that this privilege had to be periodically reviewed to determine if it still made environmental and regulatory sense. Because of the increasingly stringent regulation of burning and incineration, it has become impossible to justify Knapheide's activity, from a regulatory point of view. The time has come to end their free ride and require them to meet the same standards as everyone else.

I further warned these gentlemen that if they were found to be burning filters after this conversation, the Waste Management Program would take enforcement action and that very serious penalties existed for unpermitted incineration of hazardous waste. The company expressed their disappointment that this privilege had been withdrawn, and we briefly discussed whether Knapheide might be able to continue this procedure if they could prove the waste was non-hazardous or could operate under 40 CFR Part 266, without reaching any conclusions.

Tom Judge  
Tom Judge, Acting Chief  
Hazardous Waste Enforcement Unit  
Waste Management Program

Field Services  
Date Received

cc:Mr. Bob Eck, NRO  
TJ:en

DEC 14 1989

Date Sent  
Route



JOHN ASHCROFT  
Governor

G. TRACY MEHAN III  
Director



STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

Division of Energy  
Division of Environmental Quality  
Division of Geology and Land Survey  
Division of Management Services  
Division of Parks, Recreation,  
and Historic Preservation

DIVISION OF ENVIRONMENTAL QUALITY

Macon Regional Office  
Highway 63 North  
P.O. Box 489  
Macon, MO 63552  
816-385-2129

CERTIFIED MAIL

3.800 Marion-Knapheide ✓  
3.900 Marion

October 3, 1989

Mr. Harold Knapheide  
Knapheide Manufacturing Co.  
P.O. Box C140  
Quincy, IL 62306

Dear Mr. Knapheide:

Enclosed please find a copy of Report on Complaint Investigation, West Quincy, Missouri Businesses, which I believe is self-explanatory. As a result of this investigation, Knapheide Manufacturing Company is being issued Notice of Violation Number 3067 for violation of the Missouri Air Conservation Commission Regulation 10 CSR 10-3.030, "Open Burning Restrictions." Enclosed is a copy of the regulation and a copy of the Notice of Violation.

Due to the condition and present capabilities of your incinerator, all burning of wastes, including the ignitable hazardous wastes paint filters and overspray papers, must cease immediately. Please make other arrangements for proper disposal of these materials.

A review of our files revealed that Knapheide Manufacturing was issued a Notice of Violation for violation of 10 CSR 10-3.030, "Open Burning Restrictions," on November 8, 1979. Since this is the second violation of the regulation, the matter is being referred to the Air Pollution Control Program Enforcement Unit for appropriate action. If you have questions regarding what action may be taken, please contact Steve Feeler, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 (314-751-4817).

Mr. Harold Knapheide  
October 3, 1989  
Page Two

We trust you will give this situation your immediate attention. If you have questions about the investigation, please contact Sam Wilson or Bob Eck in our Macon Regional Office.

Sincerely,

MACON REGIONAL OFFICE

Charles S. Decker, P.E.  
Regional Administrator

CSD/swl

Enclosure

cc: Mr. Bryce Butler  
Mr. Harold Huggins  
Mr. Rick Feldberg  
Air Pollution Control Program, Attn: Mr. Steve Feeler  
Mark Twain Regional Council of Governments

REPORT ON COMPLAINT INVESTIGATION  
WEST QUINCY, MISSOURI BUSINESSES  
MARION COUNTY, MISSOURI  
September 27, 1989

INTRODUCTION

Between September 18, 1989 and September 25, 1989 the Missouri Department of Natural Resources (MO DNR) received three complaints alleging open burning by businesses in the West Quincy, Missouri area. The complaints specifically indicated that Knapheide Manufacturing Company and K & B Builders were open burning refuse from their commercial establishments. On September 25, 1989 a complaint investigation was conducted by a representative of the Macon Regional Office. During the investigation 18 businesses in the West Quincy area were contacted.

FINDINGS

1. Many of the businesses in this area use one of two commercial refuse hauling services for at least part of their wastes.
2. Knapheide Manufacturing Company was observed open burning paint solids, paint filters and overspray papers. These wastes are considered ignitable hazardous wastes.
3. TNT Speed and Sport Center was observed open burning solid wastes and trade wastes such as cardboard and shipping crates.
4. B & W Truck Repair was observed open burning assorted solid wastes including a tire and a storage battery at their salvage yard.
5. Although other open burning was not observed, several other businesses indicated they have burned some of their wastes in the past.

DISCUSSION

Businesses with representatives readily available were contacted and their solid waste disposal practices were discussed. Most of the establishments indicated that they have their solid waste picked up by a commercial hauler. A few persons indicated that most of their waste is hauled to a landfill but some has routinely been burned. Each business contacted was advised that open burning is unlawful and was left a copy of Missouri Air Conservation Commission Regulation 10 CSR 10-3.030 "Open Burning Restrictions." This regulation prohibits salvage operations by open burning, open burning of refuse, and open burning of trade wastes. Those establishments where open burning was observed are being issued Notices of Violations.

The Knapheide Manufacturing Company plant was visited and Mr. Bryce Butler, Assembly Plant Manager, and Mr. Harold D. Huggins, Manufacturing Engineering Manager, were contacted. During the initial conversation regarding open burning, they explained they burn paint filters and overspray papers in a permitted oil-fired Brule incinerator, but they do not and have not been open burning. Since off-site observations of the stack revealed much dark smoke, the gentlemen were questioned about operation of the incinerator. They reported that the incinerator was not operating properly and that the incinerator was scheduled for replacement in the first quarter of 1990.

After leaving the facility, an open fire remote from the incinerator was observed and photographs were taken from off-site. Mr. Butler and Mr. Huggins were again contacted and the incinerator and open fire were examined. The open fire, located approximately 30 feet from the incinerator, consisted of the burning of paint solids off a stack of metal grates. Observation of the incinerator revealed that the main door was stuck in the open position and smoke was being emitted from several holes in the south side of the outer covering. The main combustion chamber had a large hole mostly covered by a barrel lid on the east side opposite of the open door. Burning of wastes in a piece of equipment in this condition is relatively the same as open burning the waste in a barrel and therefore constitutes open burning. A file review indicates that the paint solids, paint filters and overspray papers are considered a hazardous waste due to ignitability. Under MO DNR Waste Management Program Policy #202, paint filters and similar waste that are hazardous only because of the ignitability characteristic may be disposed of in an approved incinerator. The incinerator was installed in 1980 under MO DNR Air Pollution Control Program Permit #0280-001. However, the present diliterious condition of the incinerator no longer makes it an acceptable waste disposal device.

Knapheide Manufacturing Company is being issued Notice of Violation Number 3067 for open burning of ignitable hazardous wastes. It is required that all burning at Knapheide Manufacturing Company cease immediately and that arrangements be made for proper disposal of all solid waste including the paint filters and overspray papers until such time that a new, appropriately permitted, incinerator can be acquired and installed.

At the time of the investigation, TNT Speed and Sport Center was observed open burning solid waste and trade wastes on the northwest part of their property near the asphalt track. Mr. Terry Traeder was contacted and the regulations were discussed. Mr. Traeder reported that much of what they have burned consists of cardboard and untreated wooden packing crates. He asked how they could obtain a permit for burning only the wooden crates in accordance with the regulations. The process and conditions were discussed and a possible site was observed. Mr. Traeder said he would send a letter of application. TNT Speed and Sport was issued Notice of Violation Number 3056 for open burning of solid waste and trade waste and it was recommended that all open burning cease immediately and arrangements be made for proper waste disposal.

Open burning of solid waste was also observed at the B & W Truck Repair Salvage Yard. At least one tire and a storage battery were being burned in addition to other assorted solid wastes. Mr. A. J. Getz was contacted and the regulations were discussed. Mr. Getz seemed unaware that the burning was taking place by his employee. Notice of Violation Number 10938 was issued to B & W Truck Repair for open burning of refuse and it was recommended that all burning cease.


Report on Complaint Investigation  
West Quincy, Missouri Businesses  
September 27, 1989  
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One complaint that was received alleged that K & B Builders was open burning refuse from their business. At the time of investigation, no open burning was observed by K & B Builders. In the absence of the manager, Ms. Dorothy Stewart was contacted and the open burning restrictions and solid waste disposal regulations were discussed. A copy of the open burning regulations was left for the manager.

RECOMMENDATIONS

1. That all burning at Knapheide Manufacturing Company cease immediately and that other arrangements be made immediately for proper disposal of the paint filters and overspray papers.
2. That all open burning at TNT Speed and Sport Center in violation of the open burning restrictions cease immediately and that arrangements be made for proper disposal of solid waste from the establishment.
3. That all open burning at B & W Truck Repair cease immediately and that arrangements be made for proper disposal of solid waste from the establishments.

SUBMITTED BY:

  
Sam Wilson  
Environmental Specialist II  
Macon Regional Office

SW/lrs



MISSOURI DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF ENVIRONMENTAL QUALITY  
AIR POLLUTION CONTROL PROGRAM  
**NOTICE OF VIOLATION/EXCESS EMISSIONS**

P.O. BOX 176  
JEFFERSON CITY, MO 65102

CENTRAL OFFICE

NO. 3067

☒ NOTICE OF VIOLATION    ☐ NOTICE OF EXCESS EMISSIONS

DATE AND TIME

September 25, 1989

11:45 ☒ AM  
☐ PM

SOURCE (NAME, ADDRESS, LOCATION)

Knapheide Mfg. Co., West Quincy Plant

Hwy. 24, West Quincy, MO Marion County

MAILING ADDRESS

436 South Sixth  
P.O. Box C140

CITY

Quincy

STATE

IL

ZIP CODE

62306

NAME OF OWNER OR MANAGER

Harold Knapheide

Bryce Butler, Plant Manager, Assembly Plant

Harold Huggins, Mfg. Engineering Manager

IN VIOLATION OF MISSOURI AIR CONSERVATION COMMISSION REGULATION 10CSR 10- 3.030, "Open Burning Restrictions"

REMARKS ON NATURE OF VIOLATION

Open burning of refuse and trade wastes

1. Open burning of paint solids (an ignitable hazardous waste) from metal grates

near east edge of property near incinerator.

2. Open burning of paint filters and overspray papers (an ignitable hazardous waste)

due to faulty and inadequately operated incinerator.

SIGNATURE (PERSON RECEIVING NOTICE)

BY MAIL

SIGNATURE (PERSON ISSUING NOTICE)

*Sam Wilson*

TITLE OR POSITION

TITLE OR POSITION/DNR REGION

Environmental Specialist II/Macon